FSA Integration Partner

United States Department of Education

Federal Student Aid

Data Strategy Enterprise-Wide
Enrollment and Access Management Team
123.1.28 Enrollment High-Level Design

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Executive Summary

The Department of Education's Office of Federal Student Aid (FSA) would like to improve the processes business entities use for signing up to conduct business with FSA. Currently, FSA Trading Partners go through separate certification, and enrollment processes to become eligible to participate in the administration of Title IV funds, to exchange data through the Student Aid Internet Gateway (SAIG), and to sign up for access to individual FSA systems. This fragmented and disjointed enrollment process makes it extremely difficult for new Trading Partners to initiate business with FSA. It also complicates the procedures existing Trading Partners use to maintain access to all the systems needed to perform their business functions.

As part of the FSA Data Strategy effort, the Enrollment and Access Management team reviewed the current methods for initial certification and subsequent enrollment procedures across all FSA systems. The team then created an Enterprise Enrollment High-Level design to streamline and simplify the existing process. The proposed solution integrates the FSA enrollment and certification requirements with recent recommendations provided in the Routing ID (RID) and Access Management initiatives. The high-level design described in this document provides a target state vision that FSA can use to make the enrollment process more efficient and more responsive to Trading Partner needs.

The Enrollment High-Level Design consists of two distinct sections, a functional analysis of the current-state and a conceptual design of the future state. The functional analysis of the current-state documents the current enrollment process based on information gathered from Federal Student Aid (FSA) system owners and key personnel, other project teams, and Subject Matter Experts (SMEs). This analysis provided a common understanding of how Trading Partner information is collected, stored, maintained and utilized during the enrollment process. Through this analysis, FSA Core Team members and system owners gained a better understanding of how the existing enrollment process works across FSA. The original high-level design for school Trading Partners was created during working sessions with the FSA Core Team. Follow up sessions were conducted with representatives from Trading Partners to ensure that their unique requirements were accommodated in the overall design.

The functional analysis of the current-state provides views at three different levels of detail describing how the FSA enrollment process works today. These levels include:

- Enterprise Level
- Trading Partner Level
- Enrollment Form Level

The Enterprise Level provides a complete view of every system a Trading Partner may need while conducting business with FSA. The Trading Partner Level provides a more detailed look at the systems used by a specific Trading Partner and provides some associated information. The Enrollment Form Level provides an analysis of all the enrollment forms used at FSA and determines the overlap that exists between forms. Collectively, this analysis demonstrates the

complexities associated with the current process and highlights many of its key problems. The major issues that were documented include:

- No centralized process
- Dissimilar enrollment forms and inconsistent forms processes
- Redundant data collection
- Multiple manual approvals
- Multiple UserIDs and passwords

The high-level conceptual design describes how FSA can streamline and simplify its current process for Trading Partner enrollment. This solution provides a single entry point for Trading Partner enrollment that simplifies the overall enrollment process yet allows for the unique requirements associated with each type of Trading Partner. The solution allows a designated administrator (DA) to obtain a Trading Partner UserID and password, acquire a RID or legacy identifier, complete the Title IV eligibility process (if required), and, by integration with the Access Management solution, obtain access to required FSA systems. After that point, the designated administrator will utilize the Access Management System to sign up or manage additional users for that Trading Partner.

The Enterprise view of the Enrollment High Level design depicts the overall process that is used to enroll a Trading Partner. The lower level Trading Partner views depict the enrollment process for each of the Trading Partners. In all there are six detailed level views that make up the high level design. They consist of:

- Conceptual School Enrollment Process
- Conceptual Lender Enrollment Process
- Conceptual Guaranty Agency Enrollment Process
- Conceptual State Agency Enrollment Process
- Conceptual Federal Agency Enrollment Process
- Conceptual Internal User Enrollment Process

Each of these processes follows the same overall flow, but certain high level steps are omitted or streamlined depending on the type of Trading Partner. A description of each step along with specific comments and considerations are provided to capture the unique features of each specific Trading Partner process. This integrated set of processes makes up the High-Level design for Enrollment Management.

This Enrollment Management Solution provides benefits for both Trading Partners and FSA.

For Trading Partners, the solution:

- Provides an enrollment process that is program focused, not system focused. Trading Partners would identify the programs that they wish to participate in and the enrollment system would determine the systems required to support that program.

- Simplifies and streamlines the enrollment process by:
  - Providing a single point of entry for Title IV eligibility, Trading Partner ID processing, and system enrollment
  - Minimizing UserIDs and passwords required by each user
  - Minimizing duplicate data collection
  - Pre-populating previously collected information
  - Supporting the use of eSignatures (as approved by FSA policy)

- Provides a single POC for training and support of enrollment problems. These processes are currently created and maintained at the system level.

- Simplifies enrollment for subsequent users through use of a delegated administrator

For FSA, the solution:

- Allows more effective enforcement of FSA security policies

- Improves security through integration of Title IV eligibility and system access

- Reduces administration costs through
  - Use of a Trading Partner designated administrator
  - Elimination of duplicate enrollment forms
  - Use of eSignatures
  - Reducing calls to various call centers or help desks

- Allows for simultaneous processing through the use of a workflow tool

- Simplifies enrollment for FSA users

During subsequent phases of the Enrollment Management effort, FSA will need to take into account the following major considerations.

Initial Enrollment Login: The proposed Trading Partner enrollment process will need to be integrated with the future Trading Partner Management (TPM) Solution to provide one point of entry for Trading Partner enrollment. This integration is necessary to satisfy the high-level requirements associated with FSA business objective A3.1 – "Streamline enrollment and registration", identified in the first phase of this project (and reported in Enrollment Business Objectives and High-Level Requirements – Deliverable 123.1.26).

Customer Training and Support: The TPM solution will need to account for educational and training requirements to teach the FSA community how to use this new enrollment process. This will address business objective C3.1 – "Effective training and customer support".

Assignment of TPM UserID and Password: The future Trading Partner enrollment process will have to integrate with the final design of the Access Management System to assign and manage Trading Partner UserIDs and passwords. This integration would allow for a common UserID and password to be initially used to complete the enrollment process and later to access FSA systems.

FSA Organization: In future phases of enrollment, FSA will need to carefully evaluate the FSA organizational structure needed to oversee and manage a new centralized process for enrollment. FSA will need to determine which FSA organization, group or person will make the ultimate decisions around Trading Partner enrollment. Today, individual system owners make this decision. In the future state where there is a single enrollment process, one FSA organization or group will need to make the decision on behalf of the Enterprise.

System Security Officer Organization Structure: Today, each System Security Officer reports to the business owner of the FSA system and is responsible for granting access to individual users. This method of approval creates a bottleneck for approving Trading Partner access by relying on a separate individual for each system. In addition, the current structure makes it very difficult to deploy a consistent FSA security policy or procedures. The System Security Officer reporting structure needs to be evaluated to determine whether it would be beneficial to have System Security Officers report to a centralized security office. This would allow a single System Security Officer to grant access to multiple FSA systems, thus removing delays in the enrollment process and allowing for easier dissemination of FSA security policies.

Next Steps

The completion of the high-level design marks a significant achievement on the road to creating a simplified enrollment process for FSA Trading Partners. The further development of the enrollment solution will now be incorporated into the TPM solution to ensure proper integration with not only the Access Management effort, but also all other Data Strategy initiatives. The next steps for Enrollment Management will be to conduct a gaps analysis (TO 147) as part of TPM. Following the Trading Partner gaps analysis FSA business owners will need to determine the approach for integrating the Enterprise-wide enrollment solution with TPM.

Amendment History

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1 Introduction

1.1 Purpose

The Department of Education's Office of Federal Student Aid (FSA) would like to improve the processes business entities use for signing up to conduct business with FSA. Currently, FSA Trading Partners go through separate certification, and enrollment processes to become eligible to participate in the administration of Title IV funds, to exchange data through the Student Aid Internet Gateway (SAIG), and to sign up for access to individual FSA systems. This fragmented and disjointed enrollment process makes it extremely difficult for new Trading Partners to initiate business with FSA. It also complicates the procedures existing Trading Partners use to maintain access to all the systems needed to perform their business functions.

As part of the FSA Data Strategy effort, the Enrollment and Access Management team reviewed the current methods for initial certification and subsequent enrollment procedures across all FSA applications. The team then created an Enterprise Enrollment High-Level design to streamline and simplify the existing process. The proposed solution integrates the FSA enrollment and certification requirements with recent recommendations provided in the Routing ID (RID) and Access Management initiatives. The high-level design described in this document provides a target state vision that FSA can use to make the enrollment process more efficient and more responsive to Trading Partner needs.

The purpose of the enrollment high-level design document is to identify the complexities in the current process and to begin to define organizational and process changes that will need to be made to improve Trading Partner enrollment. By implementing the recommended high-level design, FSA will meet the business objectives identified in the previous phase of this initiative. The resulting Enterprise-wide enrollment conceptual design would provide significant operational benefits to both FSA and its Trading Partners.

1.2 Background

FSA seeks improvements to data quality and data consistency. FSA is examining its overall approach to data to ensure accurate and consistent data exchange between customers, Trading Partners, and compliance and oversight organizations. FSA will also leverage a targeted data strategy to support program-wide goals of maintaining a clean audit and removing FSA from the General Accounting Office (GAO) high-risk list.

Task Order 123 defined FSA's Enterprise Data Vision and its overall Enterprise Data Strategy. The end result of this task order will be an Enterprise data framework that integrates the Framework, Technical Strategies, XML Framework, Common Identifiers, and enrollment and Access Management into an overall FSA Enterprise-wide Data Strategy. The purpose of the FSA Enterprise-wide Data Strategy is to define FSA's Enterprise data vision and strategy for

how it will combine the tools, techniques and processes, documented in the FSA Data Strategy Framework, to handle its Enterprise data needs.

The Enrollment and Access Management deliverables were defined to identify FSA business objectives and a high-level design for processes and capabilities that improve the initial sign-up and management of access that Trading Partners need to FSA systems and data. The previous deliverables, Enrollment Business Objectives and High-Level Requirements (Deliverable 123.1.26) and Access Management Business Objectives and High-Level Requirements (Deliverable 123.1.27), documented business objectives and high-level requirements for enrollment and for access management, respectively.

Analysis and design activities for Enrollment and Access Management were coordinated with the RID and other Data Strategy projects. Integration of data collection and analysis work among these projects will continue to provide a foundation for streamlining and simplifying Trading Partner enrollment and user Access Management across the Enterprise.

1.3 Definition of Terms

For the purposes of this deliverable, *enrollment* is defined as the initiation of a business relationship with FSA, specifically in the areas of:

- Title IV certification
- SAIG enrollment
- Initial registration of the Trading Partner's designated administrator for use of appropriate FSA systems.

Trading Partner is defined as all non-student business entities that use FSA systems. Trading Partners include post-secondary institutions (Schools), Lenders, Guaranty Agencies, State Agencies, Federal Agencies and other entities, such as Servicers authorized to act on their behalf. For the purposes of this deliverable, FSA staff and contractors, collectively referred to as Internal Users, are also included within the definition of Trading Partner.

FSA's Trading Partners must establish a formal relationship with FSA before they can begin conducting regular business transactions. FSA's enrollment process allows these Trading Partners to meet the requirements to establish a formal relationship.

The Trading Partners each have different requirements in terms of the relationships that they may need to establish with FSA. Typically, they will require access to FSA systems and integration into FSA programs. FSA must help the Trading Partners definitively determine the systems in which the Trading Partner must enroll to meet their business needs.

Workflow is defined as a business process in which information or tasks are passed from one participant to another for action, based on a set of business rules. The processes may be manual or may be facilitated by automation technology and tools. Workflow technology enables

organizations to define, implement, and manage business processes, process tasks, and resources. Workflow solutions can increase process performance and improve productivity by automating and optimizing FSA business processes.

eSignatures or Digital Signatures are defined by the Electronic Signatures in Global and National Commerce Act (ESIGN), as an electronic sound, symbol, or process, attached to or logically associated with a contract or other record and executed or adopted by a person with the intent to sign the record. Thus, an electronic signature can come in many forms, including PIN numbers, passwords, or even clicking an icon. This act makes electronic or digital signatures legally valid and enforceable in the United States. The processes or technology used in an electronic signature must be agreed to by all parties, and should be selected through an assessment of the risks associated with the data and business processes affected. The use of an eSignature would enable FSA to increase the speed and efficiency in which Trading Partners move through the enrollment process.

1.4 Scope

This deliverable covers work defined in Task Order 123 related to documentation of the enrollment high-level design. The intent of the enrollment high-level design effort is to review and analyze FSA's current enrollment environment, and to look for ways to simplify the business process for Trading Partners. This effort will begin the process of defining future solutions for FSA enrollment.

The key items that form the high-level design include:

- An Enterprise level view of the current FSA enrollment processes.
- A Trading Partner view of the current FSA enrollment processes.
- An analysis of duplicate data requests on current FSA enrollment forms
- An Enterprise level conceptual design for a future state FSA enrollment process
- A Trading Partner level conceptual design for a future state FSA enrollment process

1.5 Approach

This is the second phase of the Enrollment and Access Management initiative. This phase documents solution options and the high-level designs for enrollment and access management, and culminates in the following two deliverables:

- Enrollment High-Level Design (Deliverable 123.1.28). This deliverable defines the high-level design for providing integrated enrollment management for Trading Partners.
- Access Management High-Level Design (Deliverable 123.1.29). This deliverable defines the high-level design for providing integrated access management for Trading Partners.

Prior to beginning development of the high-level design for enrollment, FSA business objectives were prioritized to define which functional areas are most important. A thorough analysis of the current FSA enrollment processes was conducted to determine additional requirements for each

of the applications reviewed. Meetings were held with specific FSA subject matter experts to develop an overall enrollment process that would meet FSA needs.

An initial Enrollment Core Team meeting was held on September 4, 2003 to review the Enrollment Current-State Analysis and to obtain input on how to best develop the enrollment conceptual design. Feedback from this meeting was incorporated and a draft enrollment conceptual design was developed. A second Core Team meeting was held on October 9, 2003 to review this draft version. Feedback from this working session was incorporated to create the final version of the enrollment conceptual design.

A presentation on the Enrollment Initiative was delivered to the Business Integration Group (BIG) on July 29th, 2003, to explain and confirm the methodology and approach. A second presentation was given to the BIG on October 16th, 2003 to present the results of the initiative's work.

1.6 Organization of This Document

This document, Enrollment High-Level Design (Deliverable 123.1.28), and the companion document, Access Management High-Level Design (Deliverable 123.1.29), present the enrollment and access management high-level design activities for Task Order 123. This document contains a summary of enrollment related work accomplished during this phase of the project, including a current-state[1] functional analysis and future state conceptual designs. The current-state analysis and future state conceptual designs are based on information gathered from FSA Core Team members and their designees. This is a starting point that will facilitate further discussion and refinement of detailed designs for FSA Enterprise-wide enrollment.

The organization of this document is summarized below:

- Section 1: Introduction discusses the context and background for the project and this deliverable.
- Section 2: Business Objective Framework and Prioritization identifies areas where enrollment is integral to the FSA's Business Objectives.
- Section 3: High-Level Design Functional Analysis of the enrollment current-state in Enterprise, Trading Partner, and enrollment form views.
- Section 4: High-Level Conceptual Design section contains summary Enterprise views and detailed business activity diagram flows to visually represent the Conceptual Design of the FSA's enrollment future state.
- Section 5: Enrollment Business Integration describes the Data Strategy integration points with the RID and the Access Management initiatives.
- Section 6: Next Steps describes recommended next steps for the Trading Partner enrollment initiative.

[1] Note: the hyphenated term, Current-state, refers to the ***state*** of affairs at the current time. It does not refer to the 50 United ***States*** of America.

2 Business Objectives

2.1 Business Objectives Framework

2.1.1 Framework Description

The Enrollment and Access Management Vision Framework below was used to group and examine business objectives and high-level requirements. This framework is based on the Business Integration Group (BIG) Vision Framework. While the Enterprise Vision Framework was used to create this structure, the Enrollment and Access Management Business Objectives are at a much more detailed level specific to tools, processes, and functional areas for enrollment and access management.

		Core Business Outcomes		
		Provide Easier Access to Make it Easier for Our Customers to do Business With Us A. "Easier Access"	**Maintain Right & Effective Levels of Oversight Through Combination of Enhanced Tools & Customer Self-Monitoring B. "Effective Oversight"**	**Run the Business to Enable Right Actions, Right Transactions to the Right People C. "Right Transactions to the Right People"**
Core Business Enablers	Support Effective & Informed Decision Making by Making the Right Information Available at the Right Time to the Right People 1. "Effective Decision Making"	A1.1 - Focus on registration processes and access decisions at the enterprise level instead of on a per system basis.	B1.1 - Adopt a uniform decision making process for evaluating users requesting access to FSA systems.	C1.1 - Facilitate access to sets of data at the enterprise level.
	Provide the Right Security, Tools, Systems, Architecture & Technology to Enable the Business to Achieve its Outcomes 2. "Right Tools & Technology"	A2.1 - Manage enrollment and access privileges at the enterprise level.	B2.1 - Provide effective oversight of user access to FSA systems.	C2.1 - Create enterprise policy and standards for enrollment and access management.
		A2.2 - Improve self-service capabilities.		C2.2 - Maintain security of FSA systems.
		A2.3 - Balance easier access and system security.		C2.3 - Provide users with access to FSA systems appropriate for their job function.
		A2.4 - The enrollment and access solution should be flexible enough to support the requirements of current and future FSA systems.		
		A2.5 - Allow users to customize their experience with FSA systems.		
	Improve & Integrate Business Processes Into Delivery Solutions 3. "Improve Business Process"	A3.1 - Streamline enrollment and access management for Trading Partner services.	B3.1 - Meet FSA regulatory compliance requirements.	C3.1 - Provide effective training and customer support across FSA systems.
				C3.2 - Adopt enrollment and access management policies that improve business processes.

Figure 1 - Enrollment and Access Management Vision Framework

2.1.2 Framework Sector Definitions

A1: "Easier Access" and "Effective Decision Making"
Sector A1 captures business objectives that relate to the BIG Integration Vision Framework outcomes "Provide Easier Access to Make it Easier for Our Customers to do Business With Us" and "Support Effective & Informed Decision Making by Making the Right Information Available at the Right Time to the Right People."

A2: "Easier Access" and "Right Tools and Technology"
Sector A2 captures business objectives that relate to the BIG Integration Vision Framework outcomes "Provide Easier Access to Make it Easier for Our Customers to do Business With Us" and "Provide the Right Security, Tools, Systems, Architecture & Technology to Enable the Business to Achieve its Outcomes."

A3: "Easier Access" and "Improve and Integrate Business Processes"
Sector A3 captures business objectives that relate to the BIG Integration Vision Framework outcomes "Provide Easier Access to Make it Easier for Our Customers to do Business With Us" and "Improve & Integrate Business Processes Into Delivery Solutions."

B1: "Effective Oversight" and "Effective Decision Making"
Sector B1 captures business objectives that relate to the BIG Integration Vision Framework outcomes "Maintain Right & Effective Levels of Oversight Through Combination of Enhanced Tools & Customer Self-Monitoring" and "Support Effective & Informed Decision Making by Making the Right Information Available at the Right Time to the Right People."

B2: "Effective Oversight" and "Right Tools and Technology"
Sector B2 captures business objectives that relate to the BIG Integration Vision Framework outcomes "Maintain Right & Effective Levels of Oversight Through Combination of Enhanced Tools & Customer Self-Monitoring" and "Provide the Right Security, Tools, Systems, Architecture & Technology to Enable the Business to Achieve its Outcomes."

B3: "Effective Oversight" and "Improve and Integrate Business Processes"
Sector B3 captures business objectives that relate to the BIG Integration Vision Framework outcomes "Maintain Right & Effective Levels of Oversight Through Combination of Enhanced Tools & Customer Self-Monitoring" and "Improve & Integrate Business Processes Into Delivery Solutions."

C1: "Right Transactions to the Right People" and "Effective Decision Making"
Sector C1 captures business objectives that relate to the BIG Integration Vision Framework outcomes "Run the Business to Enable Right Actions, Right Transactions to the Right People" and "Support Effective & Informed Decision Making by Making the Right Information Available at the Right Time to the Right People."

C2: "Right Transactions to the Right People" and "Right Tools and Technology"

Sector C2 captures business objectives that relate to the BIG Integration Vision Framework outcomes "Run the Business to Enable Right Actions, Right Transactions to the Right People" and "Provide the Right Security, Tools, Systems, Architecture & Technology to Enable the Business to Achieve its Outcomes."

C3: "Right Transactions to the Right People" and "Improve and Integrate Business Processes"

Sector C3 captures business objectives that relate to the BIG Integration Vision Framework outcomes "Run the Business to Enable Right Actions, Right Transactions to the Right People" and "Improve & Integrate Business Processes Into Delivery Solutions."

2.2 Business Objective Prioritization

The first phase of this effort gathered and documented the Enrollment and Access Management Business Objectives and High-Level Requirements as stated by FSA. Relative priorities of these business objectives were not determined at that point but are necessary when documenting a high-level design. Due to the close relationship between Enrollment and Access Management, many business objectives apply to both categories and it is difficult to distinguish any business objectives as strictly enrollment related. Details on this evaluation can be found in Access Management Business Objectives and High-Level Requirements (Deliverable) 123.1.27, Appendix A, Business Objectives Prioritization.

The Business Objectives were prioritized according to the following criteria:

- **Benefits to FSA:** The business objectives being considered should provide benefits to FSA such as improving security or reducing the time or resources required to complete enrollment and access management activities.
- **Minimal Impact to FSA:** The business objectives that will be implemented should have minimal impact on the current operation of FSA.
- **Benefits to Trading Partners:** These business objectives should provide benefits to FSA's Trading Partners by making it easier for them to conduct business with FSA.
- **Minimal Impact to Trading Partners:** The business objectives being considered should have minimal impact on Trading Partners and should not disrupt their normal business functions with FSA.
- **Applicability to Enrollment and Access Management:** These business objectives should be applicable to enrollment and access management at FSA.
- **Alignment with FSA BIG Strategic Objective:** These business objectives should also align with the FSA Business Integration Group (BIG) strategic objectives. The BIG objectives define five major goals that FSA wants to achieve. This category measures how closely the business objective matches with the FSA Strategic Vision.
- **Overall:** The overall priority of the Enrollment and Access Management Business Objective based on the average of the other qualitative criteria.

These business objectives were rated on each of the above factors utilizing a scale of High (H), Medium (M) and Low (L). Below is the summary list of top business objectives for FSA based on the average of the factors above:

#	Business Objective	Importance
A2.1	Manage enrollment and access privileges at the Enterprise level.	H
A1.1	Focus on registration processes and access decisions at the Enterprise level instead of on a per system basis.	H
A3.1	Streamline enrollment and access management for Trading Partner services.	H
B2.1	Provide effective oversight of user access to FSA systems.	H
B3.1	Meet FSA regulatory compliance requirements.	H
A2.4	The enrollment and access solution should be flexible enough to support the requirements of current and future FSA systems.	H
C2.2	Maintain security of FSA systems.	H
C3.2	Adopt enrollment and access management policies that improve business processes.	H
A2.2	Improve self-service capabilities.	M
C2.3	Provide users with access to FSA systems appropriate for their job function.	M
A2.3	Balance easier access and system security.	M
C3.1	Provide effective training and customer support across FSA systems.	M
B1.1	Adopt a uniform decision making process for evaluating users requesting access to FSA systems.	M
C1.	Facilitate access to sets of data at the Enterprise level.	M
C2.1	Create Enterprise policy and standards for enrollment and access management.	M
A2.5	Allow users to customize their experience with FSA systems.	L

Figure 2 - Business Objective Prioritization

3 High-Level Design Functional Analysis of Enrollment Current-State

3.1 Introduction

A current-state functional analysis was conducted to obtain a detailed understanding of the existing process by which Trading Partners enroll in FSA systems.
The overall enrollment environment was viewed from three different levels:

- Highest-Level – Enterprise Diagram
- Middle-Level – Trading Partner Diagrams
- Lowest-Level – Detailed Enrollment Form Duplicate Data Analysis

Note: The full-size color versions of these diagrams are located in Appendices A & B

The Enterprise Diagram identifies each FSA system that a Trading Partner may need to enroll in to do business with FSA. This highest-level view graphically depicts which Trading Partner utilizes each system. This view is used to illustrate the extent of the FSA portfolio and presents a comprehensive list of the existing systems and associated enrollment processes.

The Trading Partner Diagrams contain more detailed depictions of the processes for each Trading Partner, capturing key enrollment information for each system. This Middle-Level view illustrates the complexity of the multitude of different requirements faced by Trading Partners in the existing enrollment processes. The Trading Partner View also allows the reader to view the some of the specific data types that are collected during the enrollment processes.

The Detailed Enrollment Form Duplicate Data Analysis details each data element collected during the individual system enrollment process. This lowest-level view demonstrates the extensive amount of detailed data that is collected from the Trading Partners and provides the foundation for analyzing duplicate data requests.

The goal of this analysis is to identify the critical points that need to be addressed during redesign of the enrollment process. This effort will only be possible if the decision-makers have a common baseline understanding of the current-state of enrollment at FSA and its impact on the relationship between FSA and its Trading Partner customers. The analysis should enable FSA to identify the organizational, policy and procedural changes necessary to improve the current FSA enrollment processes.

3.2 Functional Analysis Approach

The Functional Analysis was based on information contained in the system questionnaires collected during the first phase of this project and documented as part of Enrollment Business Objectives and High-Level Requirements (Deliverable 123.1.26). Data from the questionnaires and discussions with key FSA personnel and Core Team Members provided the information

needed to formulate the Enterprise view depiction of the Current-State of Trading Partner enrollment. This view provided an exhaustive list of every system that is utilized by FSA Trading Partners.

The enrollment initiative researched and collected additional information from current FSA Websites, FSA documents, and past deliverables to obtain FSA enrollment forms for each system. Copies of these enrollment forms were compiled in the FSA Enrollment Form Compilation Binder. Once this compilation was completed, each individual question on the enrollment forms was entered into an Excel spreadsheet in order to facilitate analysis on the complete set of data. Enrollment form titles and the questions contained within the forms were entered in spreadsheet rows and the enrollment form titles were entered in spreadsheet columns. An analysis was then conducted to identify data a Trading Partner that could be requested to provide more then once during the existing enrollment processes.

The Trading Partner view of the functional analysis was developed by a combination of rolling up information from the detailed view and integrating it with the high-level Enterprise view. Additional information was added from previous FSA deliverables and questionnaires, and by conducting follow up interviews with FSA SMEs. Finally this information was presented to the Enrollment and Access Management Core Team and their feedback was incorporated into the final version of the analysis.

Each level of this analysis is described in greater detail in the following sections.

3.3 Highest-Level Current-State Enterprise Enrollment Diagram

The Enterprise Enrollment diagram (Figure 3) provides an Enterprise-wide view of each FSA System with which Trading Partners may need to enroll in order to successfully conduct business with FSA.

Current-State Trading Partner Enrollment - Enterprise Diagram

Highest-Level Current-State View

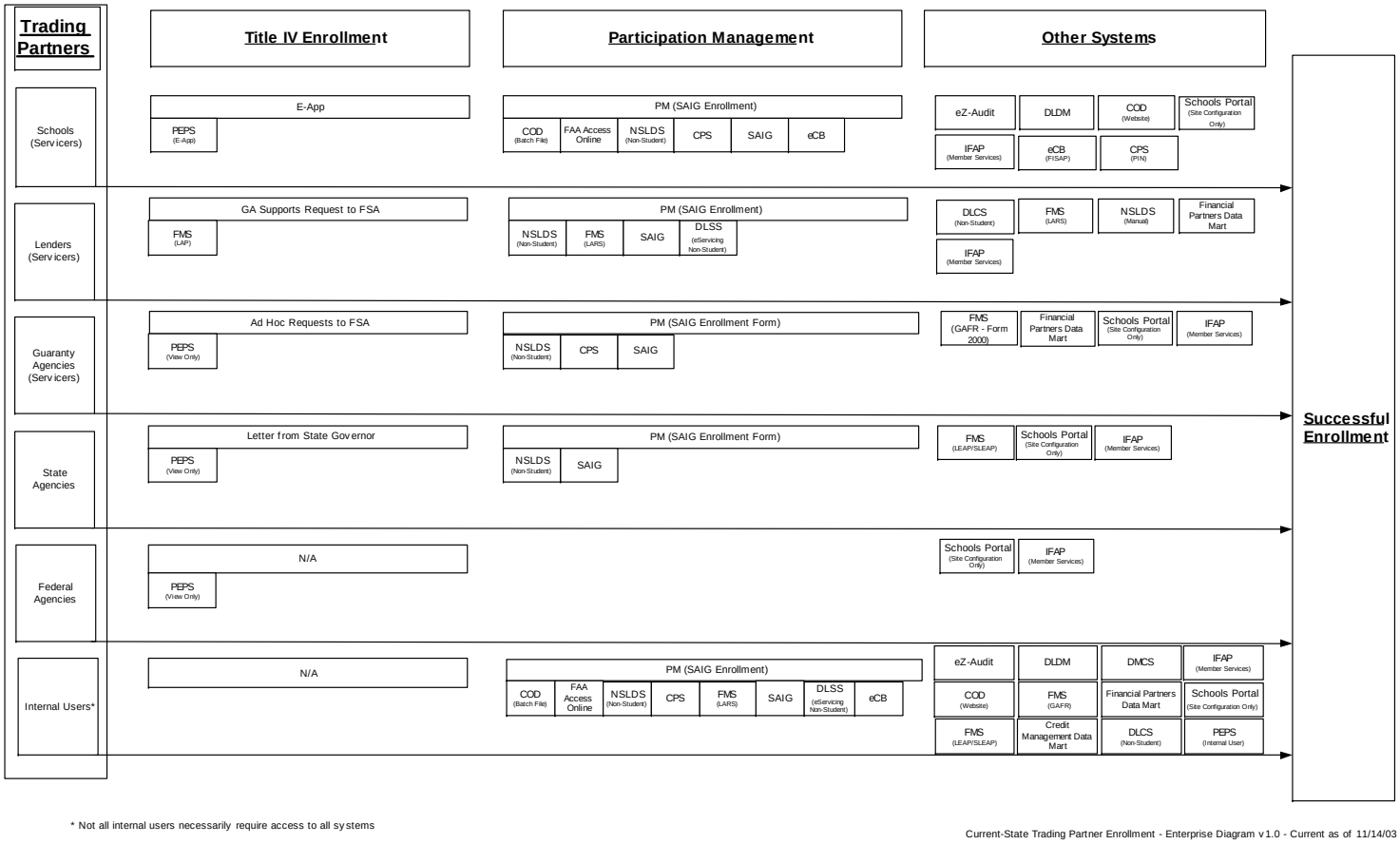


Figure 3 - Current-State Trading Partner Enrollment - Enterprise Diagram

As shown at the top of the diagram, enrollment involves enrollment in one of three main categories: Title IV enrollment, Participation Management enrollment (using the SAIG enrollment form), or enrollment in "Other Systems." These are the same categories into which systems were categorized when the current-state of enrollment was researched and presented during the first phase of this effort in Enrollment Business Objective and High-Level Requirements (Deliverable 123.1.26). Each of these three categories of enrollment presently follows different processes. Within the "Other Systems" category, each of the distinct systems follows a separate process.

Figure 3 shows the systems in which each type of Trading Partner is eligible to enroll. The primary point of this high-level analysis is to demonstrate that Trading Partners use multiple systems that require multiple enrollment processes. The Trading Partner does not necessarily require access to each system listed. A School Trading Partner, however, may be required to fill out as many as nine separate enrollment forms to do business with FSA. A more detailed analysis of the current School enrollment process will be discussed for the Trading Partner View at the next level.

It should be noted that the SAIG Enrollment Form might need to be filled out separately for each type of file exchange needed. In the School example, this could mean filling out the SAIG Enrollment Form five separate times to set up the individual mailboxes.

3.4 Middle-Level Current-State Individual Trading Partner Enrollment Diagrams

The Trading Partner View diagrams focus on individual Trading Partners and provide "Additional Information" for each system's current enrollment process.

Current-State Individual Trading Partner Enrollment - Example Diagram

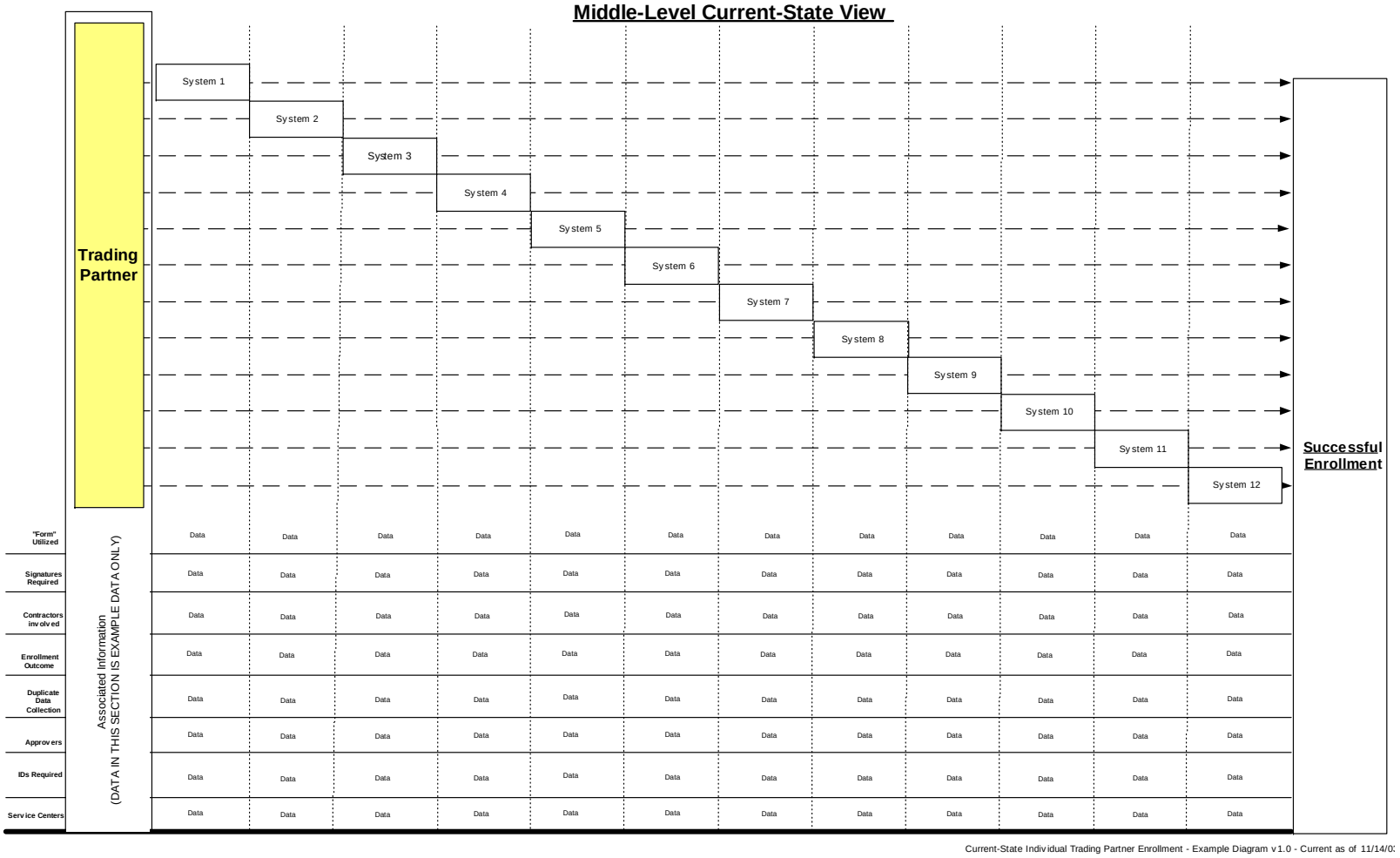


Figure 4 - Current-State Individual Trading Partner Enrollment - Example Diagram

The following components of the enrollment process are documented in the Current-State School Enrollment Diagram:

Form Utilized: There are over 18 different types of enrollment forms being utilized today. Each form is documented in the Individual Trading Partner Diagrams. Enrollment forms are the primary vehicles by which the various FSA's Programs and Systems gather information to determine whether a Trading Partner should have access to FSA programs and systems. These forms are different for each system and in some cases there are multiple forms for a single system. Examples of these types of forms include: the E-App, SAIG Enrollment Form, the Lender Application Process (LAP) form, and the DLCS System Security Form. There are also forms that are simply letters (they must be typed on Trading Partner letterhead). Most of the forms require the Trading Partner to identify themselves by the Trading Partner name, address and other demographic information. In addition to general information, the forms ask system-specific questions that require the Trading Partner to identify the individual systems to which they are requesting access.

Signature Required: Most of the forms listed above require that an authorized Representative of the Trading Partner. Frequently the Chief Executive Officer (CEO) or Financial Aid Administrator (FAA) provide a "wet signature", a physical signature on a paper form or letter. Signature forms are usually part of the enrollment form. Typically, the standard FSA System Access Request Forms contains the signature requirement. Some required signature forms are actually standalone documents (i.e. separate from the data collection form used to determine whether the Trading Partner is eligible to sign the final signature form). For example, Title IV data is collected via the E-App, but once the data has been approved, their representatives must sign a separate Program Participation Agreement (PPA) to formally finalize their Title IV eligibility. Whether the signature is included in the enrollment form itself or is a standalone form, these signatures are required to initiate a formal agreement with FSA.

Approvers: FSA employees are required to provide to review and approve enrollment requests. For example, the FSA System Security Officer for the appropriate system must approve and sign request forms for the Financial Partners Data Mart, Delinquency Loan Mart, DLCS, LARS or PEPS. Other approvers may include individuals from specialized offices within FSA, such as the Case Management Oversight (CMO) group, in the case of the E-App, and the Financial Partners Channel in the case of the LAP.

Contractors Involved: FSA has many contractors and, depending on the system with which a Trading Partner is attempting to enroll, they could come into contact with different contractor support staffs. There are at least 10 different contractors with which a Trading Partner could come into contact as they pursue FSA enrollment.

Enrollment Outcome: The result of each of the enrollment processes into which the Trading Partner can enter should be achievement of what the diagram refers to as 'Successful Enrollment.' Successful enrollment can mean many different things depending on the system and Trading Partner needs. Generally, the outcome of an enrollment process is the

creation of a UserID and password for a delegated system administrator that can be used to access the system or perform administrative tasks on behalf of the Trading Partner. Other enrollment outcomes include:

- Determination of eligibility (PEPS)
- Enablement of file exchanges (SAIG)
- Approval for access to other FSA systems (e.g. eZ-Audit, Financial Partners Data Mart etc.)

Duplicate Data Collection: Out of a total of 600 data elements requested by Trading Partner enrollment forms, there are more than 50 duplicate data elements that could be requested from Trading Partners. Some of the more common duplicate data requests require Trading Partners to repeatedly provide information on school names and addresses, OPEIDs, Lender IDs, Guaranty Agency IDs, President/CEO Name and Address or Destination Point Administrator information. Identical data collected multiple times was documented to identify opportunities for streamlining the collection, processing, and storage of Trading Partner enrollment data.

IDs required: As Trading Partners identify programs with which they need to interact (e.g., the Direct Loan Program), one of the first questions they are frequently asked is "What is your Direct Loan ID (DL ID)?" This question can be confusing to a Trading partner who may not yet have a DL ID, particularly if they are attempting to enroll with the DL program for the first time. Many other IDs are required pieces of information that Trading Partners must provide as they complete enrollment forms. There are over 10 different IDs that a Trading Partner could be asked for during the course of their enrollment efforts. While some individuals within a Trading Partners' organization may be familiar with most or at least some of these IDs, many are not. As a result, some Trading Partners may become frustrated when they are unable to complete the enrollment process without taking additional steps to find the appropriate ID numbers.

Service Centers: Service Centers are essentially help desks from which Trading Partners can seek clarification and guidance in navigating the disparate enrollment requirements of each system. Unfortunately, each Service Center has a different contact number, area of interest, and, frequently, contractor staff. There are over10 different Service Centers a Trading Partner may need to contact to successfully enroll with FSA. Because there are so many distinct service centers, many Trading Partners are unclear about how to find help when they encounter difficulties during the enrollment process.

3.4.1 Current-State School Enrollment Diagram

FSA conducts transactions with approximately 6,200 post-secondary institutions. Schools represent the majority of FSA Trading Partners that enroll to do business with FSA. To be fully enrolled, a new school must fill out forms associated with the following high-level categories:

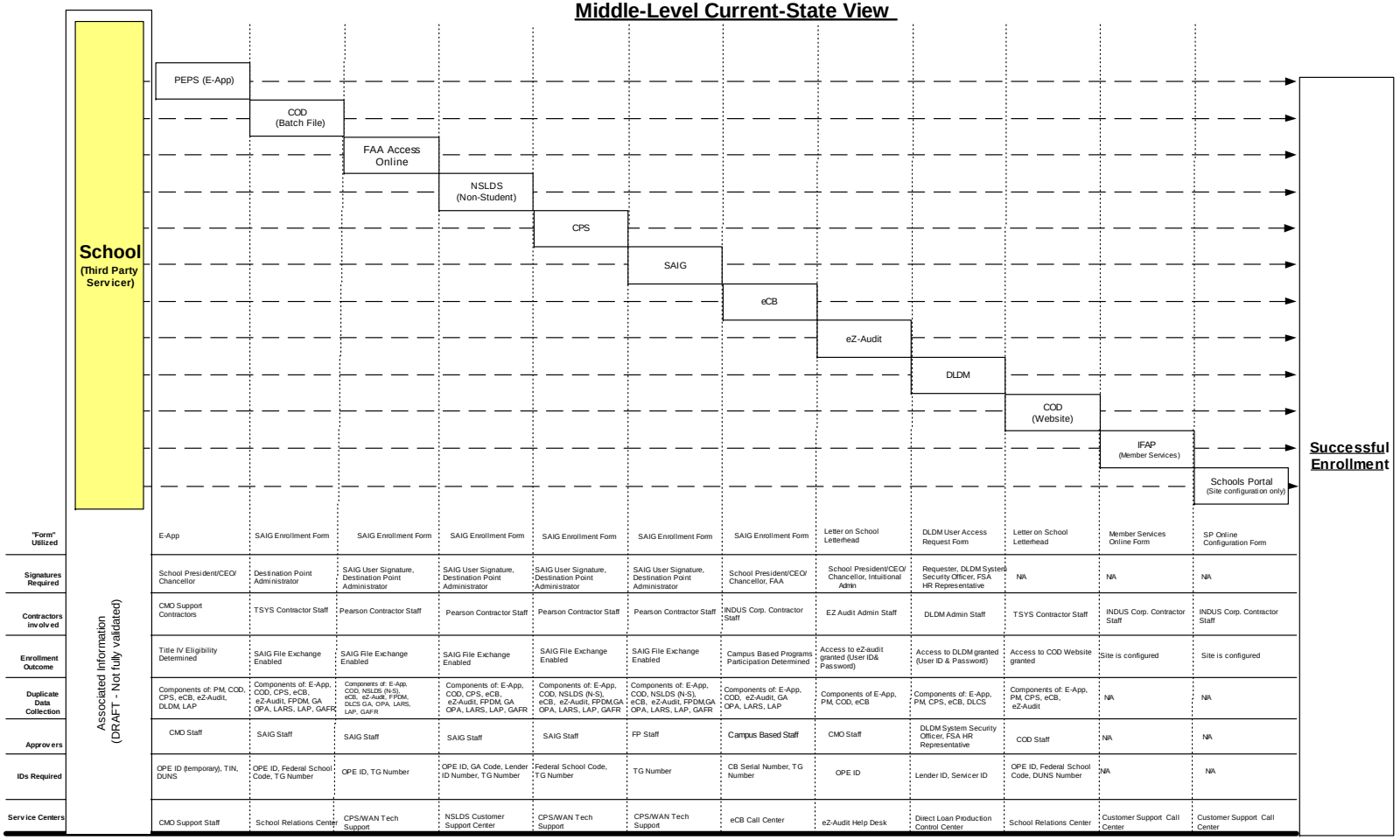
- Title IV Eligibility Enrollment
- Participation Management Enrollment for SAIG file exchange
- Other Systems' Individual Enrollment processes

The following diagram (Figure 5) summarizes the current enrollment processes for schools. Schools face a complex set of enrollment procedures involving multiple forms, duplicate data collection, and numerous points of contact. The following points illustrate some of the challenges facing schools that wish to sign up to do business with FSA.

- Schools enroll in up to 11 systems, more than any other type of Trading Partner.
- Schools may need to complete as many as nine different enrollment forms, requiring up to seven different signatures. In addition, schools may be required to fill out the SAIG enrollment form up to five separate times to establish mail box (TG) numbers for each program's designated administrator. This means that schools may need to complete a total of up to 14 separate forms to complete the enrollment process to do business with FSA.
- As many as six contractors may be involved as a School navigates the enrollment processes.
- Once completed by the Trading Partner, the forms may need approval by up to eight different approvers.
- Schools may be asked for up to nine different identifiers, numbers, or codes.
- Should a School, or a Servicer acting on their behalf, not have access to identifiers, passwords, or other codes, or become confused about any aspect of the enrollment process, there are at least eight different Service Centers or help desks, but only one may be able to provide the information required.

Current-State School Enrollment - Trading Partner Diagram

Middle-Level Current-State View



Current-State School Enrollment - Trading Partner Diagram v1.0 - Current as of 11/14/03

Figure 5 - Current-State School Enrollment – Trading Partner Diagram

3.4.2 Current-State Lender Enrollment Diagram

Lenders are the second largest group of Trading Partners that enroll to do business with FSA. There are approximately 3,600 Lenders currently enrolled to conduct transactions with FSA. To be fully enrolled a Lender must fill out forms associated with the following high-level categories:

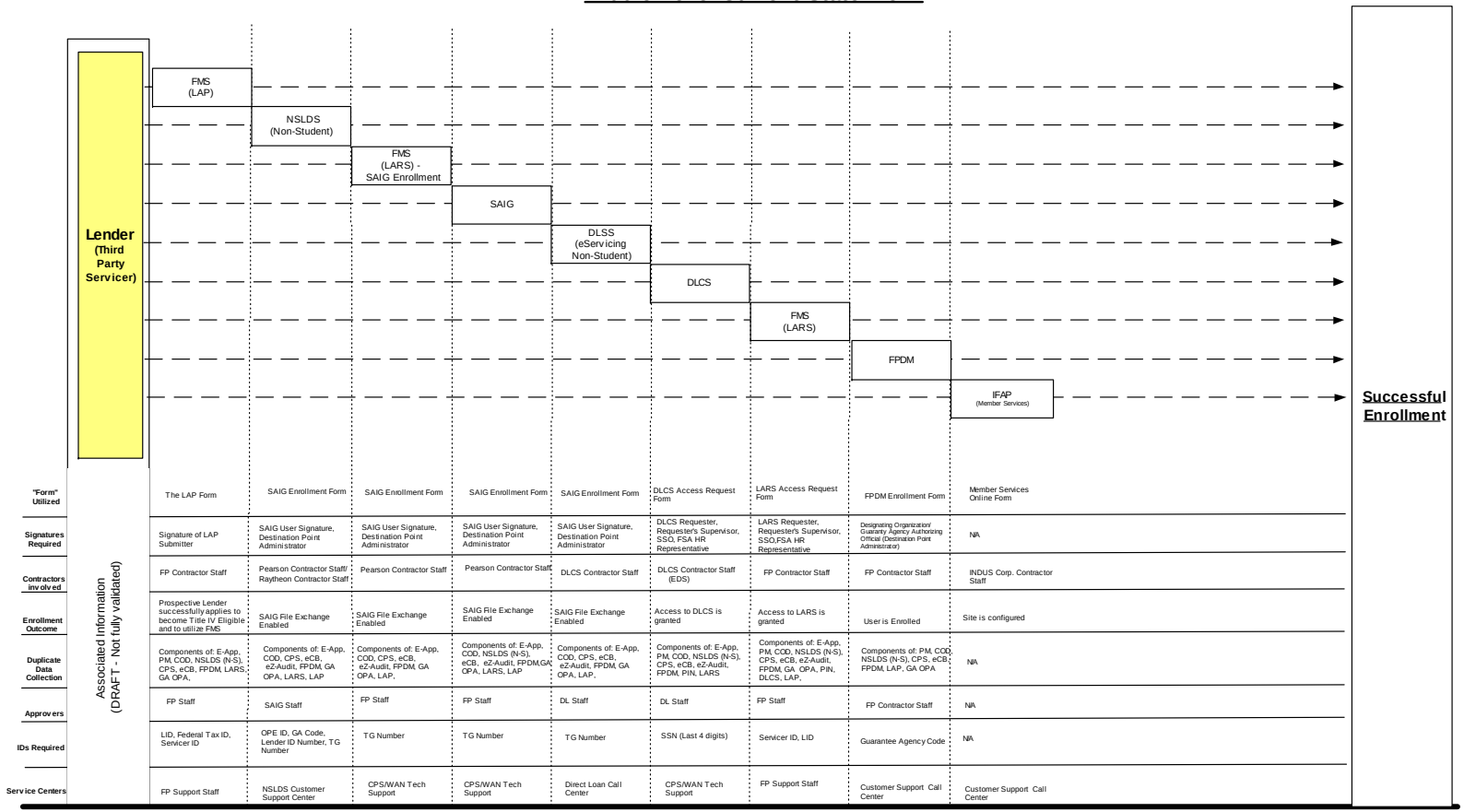
- Title IV Eligibility
- Participation Management
- Other Systems

The following diagram (Figure 6) summarizes the Lender enrollment process. Lenders enroll in seven systems requiring the completion of up to seven different enrollment forms, requiring up to nine different signatures. In addition, Lenders may be required to fill out the SAIG enrollment form up to three separate times to establish mail box (TG) numbers for each program's designated administrator. A total of up to nine forms may be required for Lenders to complete the enrollment process. The forms, once completed, are approved by up to four different approvers.

Lenders may interact with up to five contractors and can be asked for up to seven identifiers, numbers, or codes. Should a Lender, or a Servicer acting on their behalf, require assistance in completing enrollment, there are five different Service Centers that provide help on different parts of the enrollment process.

Current-State Lender Enrollment - Trading Partner Diagram

Middle-Level Current-State View



Current-State Lender Enrollment - Trading Partner Diagram v1.0 - Current as of 11/14/03

Figure 6 - Current-State Lender Enrollment – Trading Partner Diagram

3.4.3 Current-State Guaranty Agency Enrollment Diagram

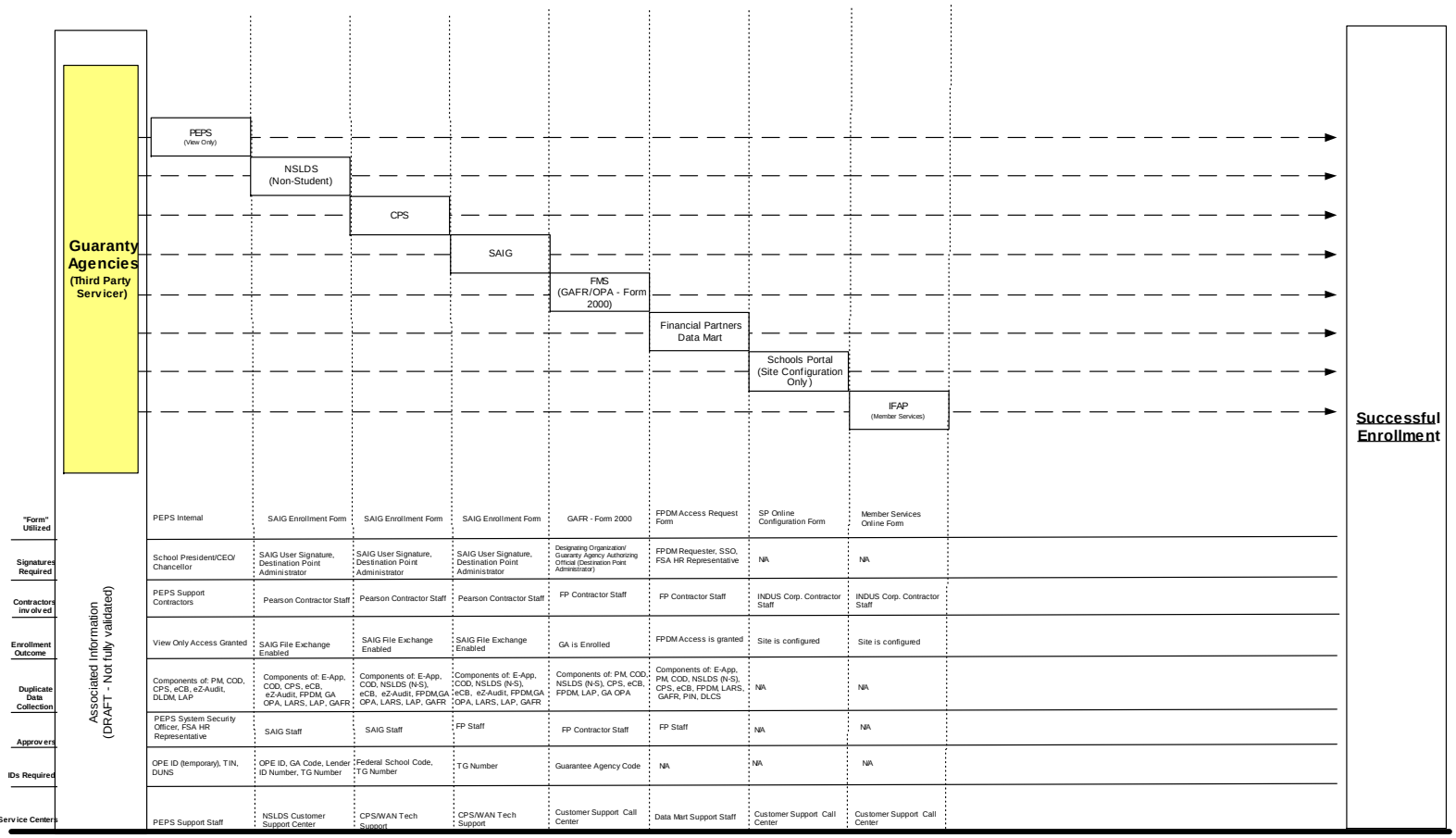
There are only 36 Guaranty Agencies (GAs) enrolled to do business with FSA. GAs enroll very infrequently, but when they do need to enroll, or to update their existing enrollment, they must do so in each of the three enrollment categories:

- Title IV Eligibility
- Participation Management
- Other Systems

The following diagram (Figure 7) shows current enrollment processes for GAs. GAs enroll in eight Systems requiring the completion of six different enrollment forms, requiring up to seven different signatures. The forms, once completed are approved by up to five different approvers. They may interact with up to four contractors and can be asked for up to seven different identifiers, numbers or codes. There are six different Service Centers or help desks to choose from, with only the correct one being able to provide the information required.

Current-State Guaranty Agency Enrollment - Trading Partner Diagram

Middle-Level Current-State View



Current-State Guaranty Agency Enrollment - Trading Partner Diagram v1.0 - Current as of 11/14/03

Figure 7 - Current-State Guaranty Agency Enrollment – Trading Partner Diagram

3.4.4 Current-State Federal and State Agencies Enrollment Diagram

Like GAs, State Agencies enroll very rarely. They too must enroll in each of the three categories:

- Title IV Eligibility
- Participation Management
- Other Systems

State Agencies enroll in up to six systems requiring the completion of five different enrollment forms, requiring up to three different signatures. The forms, once completed are approved by up to three different approvers. They may interact with up to four contractors and asked for up to seven different Identifiers/Numbers/Codes. There are four different Service Centers or help desks to choose from, with only the correct one being able to provide the information required.

Federal Agencies' enrollment tasks are minimal and they are not required to go through a Title IV eligibility process. Federal Agencies typically are only granted "read only" access and use FSA sites that require minimal approvals. To gain this access Federal Agencies would contact an FSA staff person to help them gain access to the required system. There is currently no formal process for Federal Agencies.

In addition to State and Federal Agencies, Internal FSA Users are also briefly addressed in the following diagram (Figure 8). Their system enrollment is handled on a system-by-system basis depending on the access needed. Internal FSA Users are not required to go through a Title IV eligibility process. Even so, the enrollment process for internal users is extremely complicated. Because there is no formal enrollment process for Internal Users and they often have to rely on word of mouth or informal channels to find out how to gain access to individual systems. Similar to School enrollment issues, Internal Users may log on to a large number of systems and be given separate UserIDs and passwords that need to be properly stored and updated to maintain access to the various systems. There is no centralized process for password resets or assistance.

Current-State Federal & State Agency Enrollment - Trading Partner Diagram

Middle-Level Current-State View

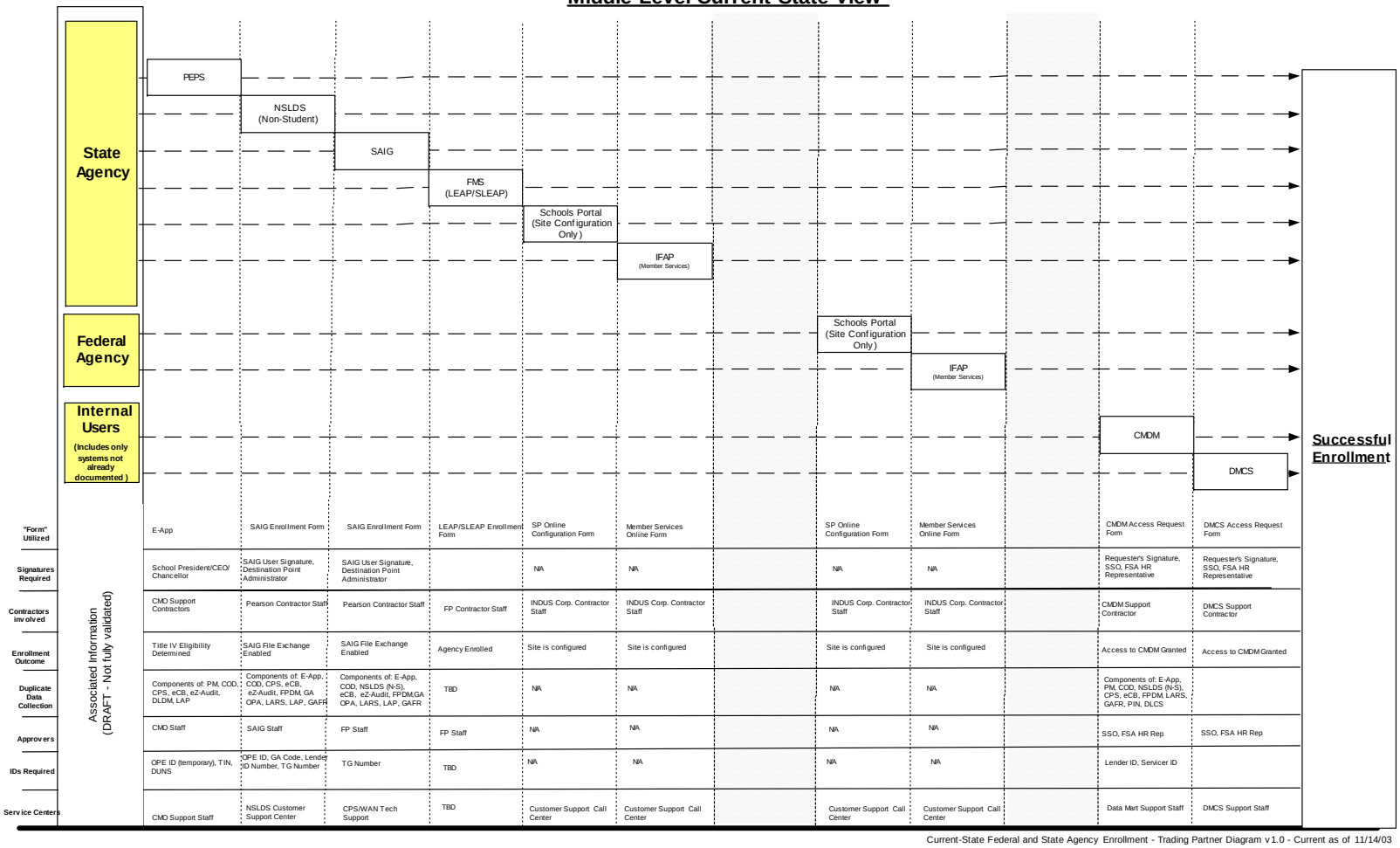


Figure 8 - Current-State Federal and State Agencies Enrollment – Trading Partner Diagram

3.5 Lowest-Level Current-State Analysis of Enrollment Form Duplicate data

The Enrollment Form Duplicate Data Analysis (Figure 9) was conducted by taking each individual system enrollment form and copying the most questions contained in those forms into an excel spreadsheet. The left-most columns list the primary questions and sub-questions questions and sub-questions found on each form. Any questions below these two levels are not included in this analysis.

A header row was created and highlighted to identify the particular enrollment form from which the different groups of questions came. The name of each form is also listed across the top of the excel spreadsheet. Figure 9 is only an excerpt from the full spreadsheet, which is included in its entirety as Appendix B.

Whenever one of these questions appeared in multiple enrollment forms an 'X' was placed in the corresponding form's column to indicate that duplication. By proceeding down the left hand column and performing a search on each of the other forms to identify overlapping questions, a complete matrix was created that demonstrates the overlap that occurs in the existing enrollment process.

This analysis revealed that there are 18 separate enrollment forms that collectively contain over 600 pieces of data. Of the 600 pieces of data, 51 of those pieces of data are collected on more than one form. Several pieces of data are collected on as many as six separate forms. During the enrollment process up to 16 separate signatures are required.

Furthermore, each enrollment form has its own unique style and appearance, offering no consistency between forms. These forms range in length from two to 41 pages and are each administered by separate FSA groups and are therefore not governed by a central security function. Although a System Security Officer must approve many such requests, these System Security Officers do not report up through a central security office, but rather report to the system business owner. In some instances, this security function is bypassed altogether and the contractor is allowed to provide access to the applicant.

Current-State Form Data Duplication Analysis - excerpt
Lowest-Level Current-State View
(Note: Full spreadsheet included as Appendix B)

Questions	Sub Questions	PEPS (EAPP)	Part. Mngt. (SAIG Enrlmnt. Form)	PEPS (Int. ED User	FMS (LAP)	GA OPA	ez Audit	FPDM, CMDM	CPS (PIN)	COD (Web)	DLCS	eCB	FMS (LARS)	LEAP/ SLEAP	IFAP/ SP	NSLDS (Non-SAIG.)	DLSS	FMS GAFR - Form 2000	DMCS (FFEL Logon Req. Form)	DLDM
PEPS (EAPP)																				
User Name		X																		
Password		X																		
Why are you submitting EAPP?		X																		
Name of Institution		X	X		X					X		X								
Other legal names for institution?		X																		
What are the first 6 digits of your 8-digit OPE ID number? (The final 2 digits already are entered for you.)		X	X				X			X		X								
What is your 9-digit Taxpayer Identification Number (TIN) assigned by the IRS?		X																		
What is your 9-digit DUNS number?		X																		
What was your most recently completed award year?		X																		
What is your current award year?		X																		
Does your institution have a web site (or home page) on the Internet?		X																		
Who is your chief executive officer (CEO)/president/chancellor?		X																		
	First name, Middle initial, Last name	X																		
	Job title	X																		
	Business street address	X																		
	City	X																		
	State (or province) and zip+4 (and country, if outside the U.S.)	X																		
	Telephone number	X																		
PEPS (EAPP)																				

Figure 9 - Lowest-Level Current-State Form Data Duplication Analysis - excerpt

4 High-Level Design Conceptual Design of Enrollment Future State

4.1 Introduction

The enrollment conceptual design describes at a high-level a proposed future state vision for enrollment processes at FSA. Given FSA's focus on Enterprise-wide solutions, the general premise of conceptual design development was that any solution:

- Should be consistent across the Enterprise
- Should be customer-centric to minimize extraneous activities required of Trading Partners
- Should simplify the diverse protocols associated with enrolling to do business with FSA

The transition from the current-state of enrollment at FSA to the future state of enrollment will not be completed in a single step. There will almost certainly be incremental changes to realize the ultimate vision of a streamlined, unified enrollment process. The goal of this effort was not to identify the exact sequencing plans for implementing such a long-term effort, but instead to identify a desired future state that can serve as the target for future planning and detailed design.

4.2 Conceptual Design Approach

Interviews with representatives of each of FSA's program areas and each of FSA's Systems were conducted and the relevant information obtained during those interviews informed the development of the enrollment conceptual design. Where appropriate, the enrollment initiative conducted follow-up interviews to gain additional clarification from FSA resources.

Some of the major design principles that emerged included suggestions to do the following:

- Simplify redundant processes
- Minimize repetitive data collection
- Make the process easier for Trading Partners and FSA to understand
- Minimize the number of contact points for Trading Partners
- Integrate other related processes or information into a revised design (i.e., RID, Access Management)

In order to graphically represent the conceptual design of FSA's enrollment future state, the two following types of diagrams were created:

- Conceptual Enterprise Enrollment Diagram (Higher Level)
- Conceptual Trading Partner Enrollment Business Activity Diagram (Lower Level)

These two levels of diagrams are explained further in the following section.

4.3 Higher-Level Conceptual Enterprise Enrollment Diagram

The Conceptual Enterprise Enrollment Diagram (Figure 10) depicts the notion that in the future, each of the different types of Trading Partners would utilize the enrollment system as their initial and ongoing entry point for their FSA enrollment needs. The diagram indicates that each Trading Partner begins the process by logging onto the "Enrollment Website." The enrollment website simply refers to the front-end of any Enterprise-wide enrollment system that may eventually emerge.

In the Enterprise Diagram below, the Trading Partner is shown proceeding through a series of very high-level questions relating to their Trading Partner type. This determination is the first one that must be made by the system. Depending on the type of Trading Partner seeking enrollment, the process will differ. Each Trading Partner has unique requirements for enrollment but each one also has some process steps in common.

Additional details about the content of the Enterprise Enrollment Diagram can be found following the diagram.

Note: The full-size color versions of this diagrams is located in Appendix C

Conceptual Trading Partner Enrollment - Enterprise Diagram
Higher-Level Conceptual View

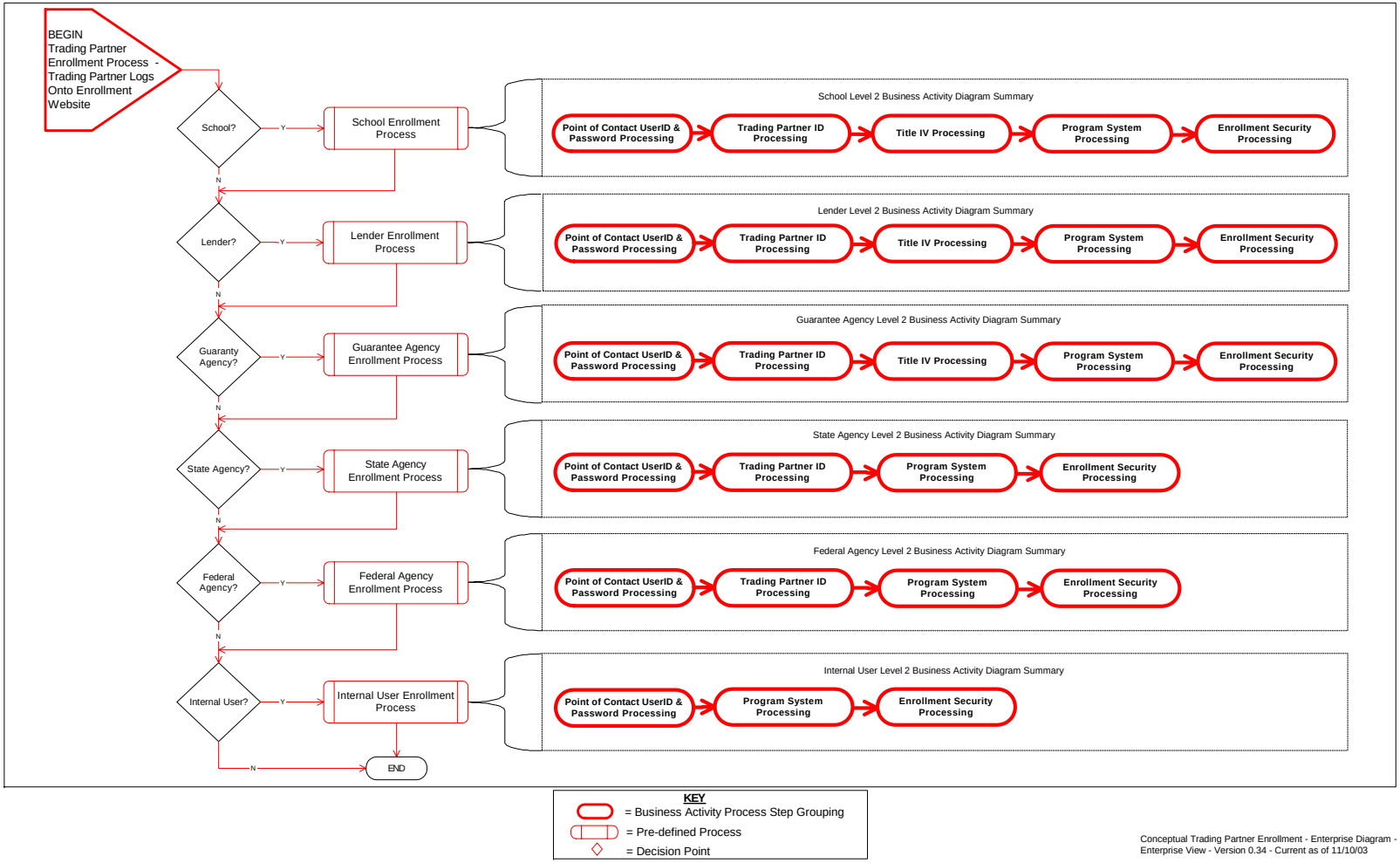


Figure 10 - Conceptual Trading Partner Enrollment - Enterprise Diagram

The following are the major components of the Enterprise Enrollment Diagram (Figure 10):

Decision Point Diamonds: The symbol for a Decision Point is included in the Key at the bottom of the diagram. The Decision Points are the diamond shaped symbols that appear on the left side of the diagram. The words inside the decision Point diamonds convey the question to the Trading Partner such as type of Trading Partner. As the Trading Partner follows the flow shown in the diagram, they would first be asked if they are a School? If the answer to that question is 'Yes', then the Trading Partner is guided to the School enrollment process' pre-defined process box. The pre-defined process boxes are explained below.

If the Trading Partner indicated that they are a school, and subsequently preceded through the School enrollment process, the Trading Partner would need to answer the other question of whether or not they are also a Lender in the second decision point diamond. In some cases, they can be both a School and a Lender. Only after completing any enrollment processes that the diagram dictates will the Trading Partner reach the 'End' of the overall enrollment activities they will need to complete.

Pre-defined Process Boxes: These boxes, which have rounded corners and lines on each side of the text they contain are intended to convey the fact that the Pre-defined or Pre-existing Process referenced in each box is a substantial series of steps. Each of these individual steps is not shown in their full detail at the high-level of this Enterprise Enrollment Diagram.

Business Activity Step Grouping Ovals: These elongated ovals with thick red borders are found within the large 'Business Activity Diagram Summary' boxes. The ovals are color-coded yellow, orange, green, blue and pink. Each of these ovals represents a grouping of more detailed process steps. Each of these processes is important but not all would necessarily be required for each type of Trading Partner. For example, Internal Users would not be required to obtain a Title IV eligibility determination and would therefore not need to engage in that Title IV Processing steps. The meanings associated with each of these five groupings are detailed in the Middle-Level View Diagrams.

4.4 Lower-Level Conceptual Individual Trading Partner Business Activity Diagrams

The Individual Trading Partner Conceptual Business Activity Diagram (Figure 11) represents the experience of one of the particular types of Trading Partners as they progress through their unique enrollment process. Figure 11 depicts only the process for Schools and is used here as an example of the Middle-Level Diagrams. There is a Business Activity Diagram for each of the Trading Partners. Each Trading Partner follows a distinct process today and each will likely need to follow process that is tailored to their needs in the future. Therefore each of the conceptual design processes is subtly distinct. Additional details of each Trading Partner diagram's content are provided in the following diagram(s).

Note: The full-size color versions of these diagrams are located in Appendix C

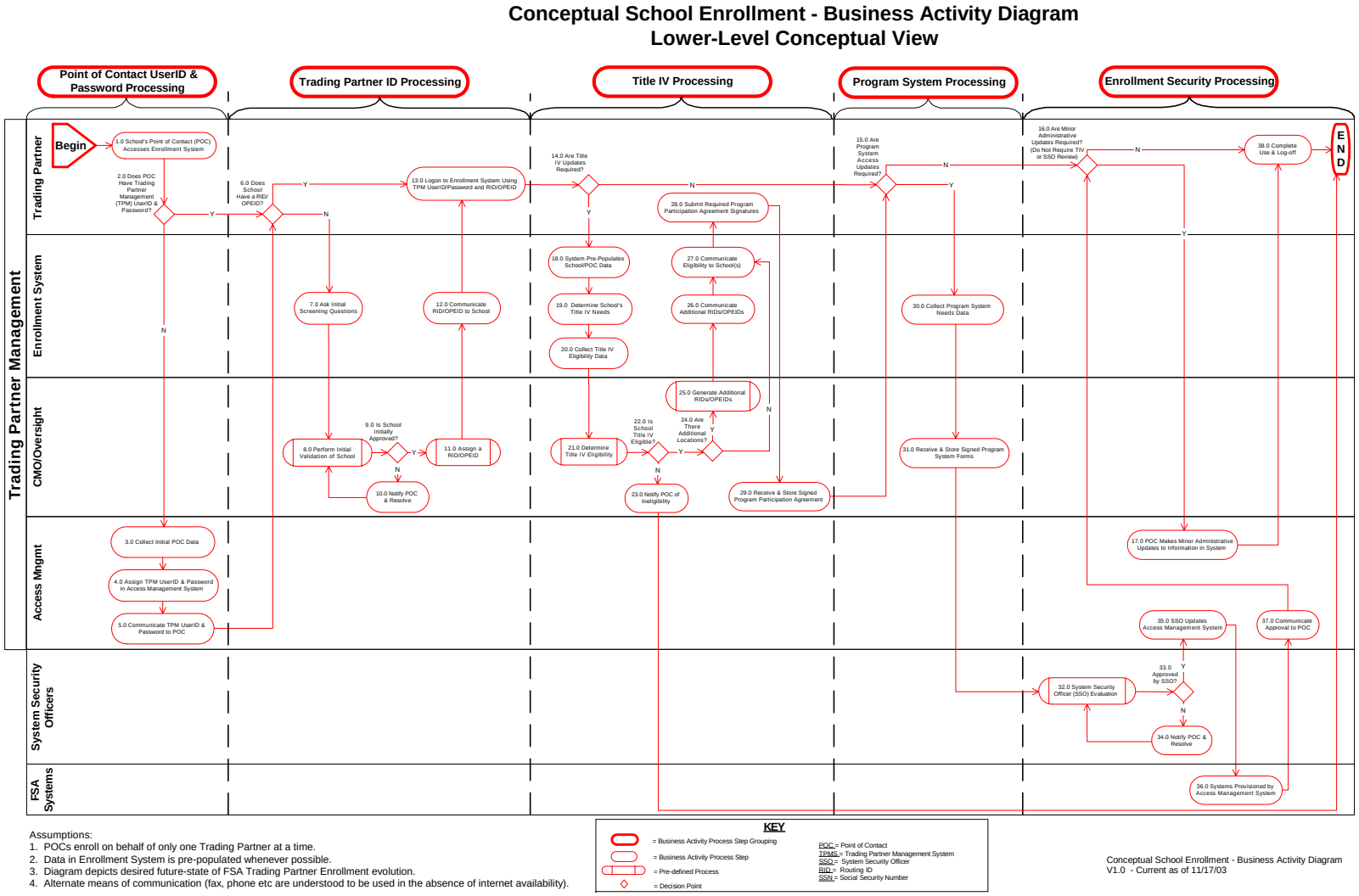


Figure 11 - Conceptual School Enrollment – Business Activity Diagram

The following are the major components of the Business Activity Diagram:

Business Activity Process Step Groupings: These elongated ovals with a thick red border serve as the column headings for the Business Activity Diagram. These are the same process step groupings that were shown in the Enrollment Enterprise Diagram (Figure 10). The groupings each refer to a certain type of processing, and the steps included in each grouping are related to the completion of their respective types of processes/processing.

Each of these ovals has a distinct color and the specific process steps associated with the grouping are shown in the same color. The headings include:

- ***Point of Contact (POC) UserID & password Processing (Yellow):*** The steps included in this grouping are centered on the need for the POC to obtain a TPM UserID and password. While the TPM solution has not yet been defined or developed, it is likely that there will eventually be a single UserID and password (the TPM UserID and password) for each of the individuals representing Trading Partners that may need to interact with FSA's Title IV programs or their associated systems.

- ***Trading Partner ID Processing (Orange):*** Each Trading Partner will eventually have a unique ID associated with them. While the RID is likely to be the ID that eventually replaces most of the entire legacy IDs, the diagram indicates that other legacy IDs will need to be left in operation for a period of time until they are phased out in an appropriate manner.

- ***Title IV Processing (Green):*** Title IV Processing includes all of the steps that deal with the request for Title IV eligibility, evaluation, and determination on that request as well as communication of the decision to the Trading Partner.

- ***Program System Processing (Blue):*** This grouping of Program System Processing steps allow the POC to identify the specific needs that they have for access to FSA systems. The data collection that occurs during these steps is similar to the collection of data that currently occurs via the multiple system access request forms that Trading Partners are required to complete.

- ***Enrollment Security Processing (Pink):*** The enrollment processes each have unique security functions that are associated with them, which taken together comprise the enrollment Security Processing Grouping. The final authorization of the Trading Partner's POC for access to FSA systems will continue to be the sign-off of a System Security Officer. The System Security Officer is also responsible for updating the Access Management System, which in turn provisions the FSA systems to which access is required.

Swim Lane Headings: The six large rectangles that run across the entire diagram are called "swim lanes." Each of the swim lanes' headings indicates the common area with which everything in that swim lane is associated. The six swim lane headings are detailed below:

- ***Trading Partner:*** Steps that are shown in the Trading Partner Swim Lane indicate that the Trading Partner or their Representative is expected to initiate the action or respond to the question in order to proceed with the enrollment process.

- ***Enrollment System:*** Steps that are shown within this swim lane are steps that are either initiated by the Trading Partner (e.g. logging on or off from the system) or require the decisions of the Trading Partner's POC to be input into the system (e.g., Are Title IV Updates Required?).

- ***Oversight:*** Steps that appear in this swim lane primarily involve the FSA group that provides oversight for the given type of Trading Partner. For examples, this swim lane is called Case Management Oversight (CMO)/Oversight in the Schools' diagram and Financial Partners (FP)/Oversight in the Lenders' diagram because CMO and FP provide the oversight for these two types of Trading Partners.

- ***Access Management:*** Steps that rely directly on the Access Management System, which is described in Sections 2.2 – Conceptual Design – Enrollment and Access Management Vision Solution and 2.3 – Description of Access Management Components of the Access Management High-Level Design (Deliverable 123.1.29).

- ***System Security Officers:*** Steps are the responsibility of System Security Officers within the Enterprise. The role of the FSA System Security Officer is outside the scope of this initiative but the need for the business process steps listed in the System Security Officer swim lane will need to be performed by an authorized FSA security resource.

- ***FSA Systems***: The FSA System swim lane includes actions, such as provisioning, that directly impact FSA's Systems.

TPM Swim Lane Grouping: This is the tall, thin rectangle on the far left-hand side of the diagram that includes the words 'Trading Partner Management.' It groups together the four adjacent swim lanes. This grouping is conveys the notion that the following elements will all be part of whatever emerges as FSA's TPM efforts progress:

- Trading Partner
- Enrollment System
- Oversight Group

- Access Management System

Business Activity Process Step: These elongated ovals with a thin red border are the majority of the items depicted in the diagram. These items represent the individual steps that must be performed to achieve the business activity that is the desired outcome of the overall process. Each of these ovals is color-coded to correspond to the Business Activity Process Step Grouping Ovals with which they are functionally associated.

Pre-defined Process Ovals: These elongated ovals, which have lines on each side of the text they contain, are intended to convey the fact that the Pre-defined or Pre-existing Process referenced in each oval is a substantial series of steps. Each of these individual steps is not shown in their full detail at the level of this Business Activity Diagram. The detailed content of the Pre-Defined Process Ovals are not in the scope of the enrollment effort.

Decision Points: These Diamonds are similar to the decision point diamonds found in the Higher-Level Enterprise Enrollment View Diagram. The wording that conveys the question associated with each decision point, however, is located just outside of each of these diamonds instead of inside them. Additionally, the questions associated with the decision points in this diagram are more nuanced and probing than the more fundamentally questions about Trading Partner Type found in the Highest-Level Conceptual Enterprise Diagram.

4.4.1 Conceptual School Enrollment Diagram

The School Business Activity Diagram (see Figure 10 above) involves the following business activity access steps.

1. School POC Accesses Enrollment System

   - **Description:** The School's POC is the individual that is authorized to work with FSA on behalf of the school in order to complete the FSA enrollment process. The POC will initiate the enrollment process by logging onto the enrollment system. This URL will be the one point of entry to enroll or register a Trading Partner for use of FSA systems. Appropriate education and training sessions will be created to inform the Trading Partner POCs of the URL. The exact URL and links associated with it will be determined during detailed design.
   - **Comments and Considerations:** Some schools may wish have more than one individual work with FSA on their behalf. There are provisions for schools to have multiple users accessing the enrollment system. Because each individual will have their own TPM UserID & password, the system can allow for multiple authorized users while tracking which POC performs each individual transaction.

2. Does POC have a TPM UserID and password?

- **Description:** The first question that the enrollment website would ask the School's POC is whether or not that individual has a TPM UserID and password.
- **Comments and Considerations:** While the TPM solution has not yet been defined, it is likely that there will be a single UserID and password (the TPM UserID and password) for each of the individual that may need to interact with FSA's Title IV programs or their associated systems.

3. Collect Initial POC Data

- **Description:** If the POC indicates that they do not have a TPM UserID and password, they would be routed to the Access Management System. The Access Management System would collect initial demographic data about the POC. The demographic information collected during this step would be linked to the POC in the Access Management System from this point forward.
- **Comments and Considerations:** Future consideration should be given to the possibility of incorporating a Social Security Number (SSN) Screen at this step in the process. If this type of SSN screen were incorporated into the system, individuals who had been debarred would be immediately identified and disallowed to continue with the enrollment process.

4. Assign TPM UserID and password in Access Management System

- **Description:** The assignment of a TPM UserID and password to the POC in the Access Management System is completed during this step. This is the same UserID and password that the POC will use to access any FSA system.
- **Comments and Considerations:** The initial UserID & password assigned to the Trading Partner POC will be updated by the POC upon initial logon to the system and again at regular intervals.

5. Communicate TPM UserID and password to POC

- **Description:** Once the TPM UserID and password have been generated within the Access Management System, they will be communicated to the POC via email, phone or in another secure manner.
- **Comments and Considerations:** FSA has guidelines in place governing the communication of UserID & password information. These guidelines should be taken into account when developing the UserID and password communication capability. The enrollment system would initially utilize the workflow capability contained within the Access Management System.

6. Does School Have a RID/OPEID?

- **Description:** This question requires the POC to determine whether the Trading Partner has a required RID/OPEID. In addition to the TPM password (which the

POC already has at this point) the RID would link the POC to the appropriate school in order to complete the enrollment process.

- **Comments and Considerations:** It must be anticipated that the POC may not know if their School has a RID/OPEID. Therefore, the enrollment system will have a lookup table that will facilitate the research a POC could do online in order to best determine if their School has a RID. The lookup table would have to be sophisticated enough to search for possible RIDs on the basis of multiple possible search criteria including School name (and former names), School address or School ownership. If, after having used the lookup table, it becomes clear that the School does not have a RID/OPEID, the POC would be directed to take steps to secure the Trading Partner ID on behalf of their School.
- **Comments and Considerations:** The end-state solution could utilize the RID and not the OPEID. Therefore, the solution would need to be developed in a flexible manner to handle either or both IDs.

7. Ask Initial Screening Questions

    - **Description:** The enrollment System now asks the POC to provide some basic information about their Trading Partner. These are high-level questions similar to the six initial screening questions that contained within the E-App. This would include queries as to the name, address or structure of the applicant institution.
    - **Comments and Considerations:** The high-level design assumes that the CMO office will continue to perform the initial validation step for school Trading Partners. It is anticipated that TPM will streamline this process. Until that time, this step can be understood as the asking of the traditional six initial screening questions, from the existing E-App and some additional questions required by the RID process.

8. Perform Initial Validation of School

    - **Description:** This is a Pre-defined process step. At a minimum, the CMO reviews the information collected in question 2, 6a, 14, 18, 29 and 35 and ensures that the school had been accredited by an approved accrediting agent. This initial validation step does not constitute the full Title IV validation process. Instead, it is simply a means of gathering sufficient information that a RID/OPEID can be assigned. The full Title IV decision is made by CMO later in the overall enrollment process.
    - **Comments and Considerations:** Additional work will be required to perform the validations needed for RID assignment and any other validations that FSA requires. Enrollment system requirements for this step are simply to provide the appropriate information to the CMO in order for them to evaluate the request for a RID.

9. Is the School Initially Approved?

- **Description:** The System requires that a determination be made as to the initial Trading Partner ID generation approval for the School. The CMO Representative who has conducted the initial validation of the School's screening question information answers this question.
- **Comments and Considerations:** Based on the CMO Representative's answer to this question, the Trading Partner ID Processing moves forward or is discussed in order to resolve issues that remain unresolved. CMO Representatives must make this decision based upon their internal guidelines.

10. Notify POC & Resolve

- **Description:** If the Trading Partner were found by the CMO Representative to be not initially approved, then the CMO Representative would contact the POC to attempt to resolve whatever issues have been identified.
- **Comments and Considerations:** It may be that the issues identified cannot be resolved. If for example, the POC has been debarred, or the Trading Partner appears to have a problematic history, the CMO Representatives would take steps to deal with the apparent inappropriate attempt to gain access to FSA systems.

11. Assign a RID/OPEID

- **Description:** This is a pre-defined process that exists outside of the scope of the enrollment effort. The RID is a unique identifier for the School (or other Trading Partner) that provides a single reference number that all FSA systems, program offices and other partners must understand to be the same School. The RID is an eight-digit number that contains no additional meaning beyond being a constant and universal identifier for the Trading Partner to which it is assigned.
- **Comments and Considerations:** Other identifiers, including the OPEID may also be assigned at this point. Legacy identifiers may be phased out eventually but until such time as they are obsolete would be assigned at this point in the enrollment process.

12. Communicate RID/OPEID to School

- **Description:** After being approved for a RID/OPEID, the School will have their RID communicated to them via the enrollment system's workflow capability.
- **Comments and Considerations:** The communication of the RID/OPEID to the School could be accomplished via an email to the POC but could also be transmitted in other manners to comply with security policies or the School's capabilities.

13. Logon to Enrollment System Using TPM UserID and password and RID

- **Description:** The POC now utilizes their TPM UserID and password, along with the RID to access the enrollment system.

- **Comments and Considerations:** This UserID and password will be the same UserID and password used by the POC to conduct any TPM business on behalf of their School.

14. Title IV Updates Required?

- **Description:** Now that the School's POC has successfully logged onto the enrollment system, they indicate the type of updates they would like to make and the enrollment system will determine if those changes require Title IV eligibility review.
- **Comments and Considerations:** An example of a situation in which the POC would not need to make Title IV updates would be a scenario in which an eligible school logs onto the enrollment system to make minor demographic updates to the contact information stored within the Access Management System. Such minor updates could include updates to the POC's email address or phone number but would not include a change of the Trading Partner's name or address which would represent Title IV changes.

15. Are Program System Access Updates Required?

- **Description:** The POC has now either complete or bypassed the Title IV steps in the process and is asked the question of whether they have a need to gain new access for the POC to FSA Systems or need to modify POC access.
- **Comments and Considerations:** The type of FSA System access to which this question refers is access for the School's authorized enrollment POCs. Once the school's authorized enrollment POC has access to a given system, there are circumstances in which they can provide access to other users within the school. The role of the Delegated Administrator within a Trading Partner's organization is detailed in Section 2.3 – Description of Access Management Components of the Access Management High-Level Design (Deliverable 123.1.29).

16. Are Minor Administrative Updates Required?

- **Description:** The POC is asked if the only updates that they need to make are minor updates to their personal demographic information.
- **Comments and Considerations:** Minor updates, such as updates to a POC's email address do not require CMO review or review by the System Security Officer and therefore such changes are immediately adopted by the system.

17. POC Makes Minor Updates to information in System

- **Description:** The POC, having identified their need to make minor demographic updates in the system now does so.

- **Comments and Considerations:** No validation or approval is required for this type of change so upon completion of the changes, the POC proceeds to log out of the system.

18. System Pre-Populates School's Title IV Data

- **Description:** Any relevant data that has been provided by the POC or by any other authorized POCs for the School is pre-populated within the appropriate fields. The data that could be pre-populated would include any demographic information about the School and the POC as well as any other program information that may have been previously entered into the system.
- **Comments and Considerations:** The enrollment system will always pre-populate data whenever possible. The pre-population of data is intended to reduce the amount of duplicative data entry for Trading Partners.

19. Determine School's Title IV Needs

- **Description:** The POC is now asked a series of questions to help determine the Title IV programs in which they will need to enroll. These questions will focus on the School's business and program needs that will determine the FSA systems that the school will need to access.
- **Comments and Considerations:** Whenever possible, the enrollment system will ask targeted questions intended to allow the POC to bypass any potentially unnecessary steps and focus on the steps in the process that will most efficiently allow them to achieve their desired result. By asking the questions that must be asked in order to understand the School's needs, the system will have the information to determine the most efficient path for the POC to follow.

20. Collect Title IV Eligibility Data

- **Description:** The system now asks the appropriate question to be able to determine the school's Title IV eligibility.
- **Comments and Considerations:** These questions are similar to those asked on the existing E-App but may be tailored based on the School's needs. For Schools enrolling for Title IV Services for the first time, they are required to answer the full set of Office of Management and Budget (OMB) approved questions, regardless of the programs for which they are requesting eligibility. In fact, the schools are advised to apply for eligibility to all of the Title IV programs as part of their initial enrollment so that they are approved for all of the programs with their eligibility determination. If a School wishes to gain eligibility to a program for which they are not presently approved, then a new eligibility decision is required. The current version of the E-App is approved for use through 2005. These eligibility questions are re-approved every three years. It should be noted that any changes to these eligibility questions made by the enrollment system would require OMB review.

21. Determine Title IV Eligibility

- **Description:** This is a pre-defined process that exists outside of the enrollment initiative's scope. The CMO Representative reviews the Title IV eligibility answers the School has provided in the enrollment system. Based on that information and on CMO's standards for eligibility, the CMO Representative makes a Title IV eligibility determination. The enrollment system's requirements for this step are simply to provide the appropriate information to the CMO office in order for them to evaluate the information. The enrollment system is also required to be able to record the decision determined by CMO.
- **Comments and Considerations:** CMO typically approves Schools for eligibility but has certain standards that must be met. Some of the CMO's considerations are driven by regulations. For example, the School must be accredited and licensed. Other CMO criteria are internal to FSA and are reviewed and revised by FSA and CMO Representatives as needed. Another example of a consideration that factors into the eligibility decision is the requirement that at least 10% of a school's funding comes from a source other than Federal funds.
- **Comments and Considerations:** If a school is determined to be ineligible for Title IV programs, the CMO Representative contacts the school to identify the existing issues. In addition to identifying for the school which issues exist, the CMO Representative will work with the School's POC to help the school take the appropriate actions to achieve Title IV eligibility.

22. Is the School Title IV Eligible?

- **Description:** The system will require the CMO Representative to provide the answer to the question of Title IV eligibility for the School.
- **Comments and Considerations:** The CMO Representative answers the question based on their understanding of the School's enrollment request and the applicable CMO standards and policies.

23. Notify School (of ineligibility)

- **Description:** The School must be notified of the determination that they have not achieved Title IV eligibility.
- **Comments and Considerations:** The CMO Representative makes the notification through the system's workflow capability. The CMO Representative would indicate to the school that the School "Has not met the requirements for Title IV eligibility at this time but should reapply once the issues have been addressed." The CMO Representative also identifies the issues that have precluded the school's eligibility.

24. Are there Additional Locations?

- **Description:** This decision box is a process step that routes the enrollment information differently depending on the information provided. If additional locations were identified, the enrollment system would route that information appropriately to generate additional RIDS/OPEIDs.
- **Comments and Considerations:** The data that the CMO Representative needs to be able to make this determination has already been collected. The School POC should have identified whether the School had additional locations when they input the Title IV eligibility data. That data collection step would also allow for Title IV schools to identify additional locations that come about from Changes of Affiliation. One of the most important checks performed by the CMO is to determine if the additional locations are owned by the same owner as the school's main location. Today as soon as the additional locations are determined eligible they can begin to draw funds. Any future implementation should ensure that a RID is assigned in order to properly track and monitor funds appropriately. Also, today even if an additional location is denied an OPEID is generated in PEPS.

25. Generate Additional RIDs/OPEIDs

- **Description:** This is a Pre-defined Process. If additional RIDs, OPEIDs or other identifiers were required, the CMO Representative or other oversight group's representative would perform the function of generating additional IDs.
- **Comments and Considerations:** While the RID for the POC's School's main location was generated previously in the process, the RIDs for additional locations are not generated until this point because unless the main location is Title IV eligible, the additional locations cannot be Title IV eligible. To this point, none of the additional locations would have been able to interact with FSA and so they will not have needed a RID/OPEID until this point.

26. Communicate RID/OPEID to Additional Location(s)

- **Description:** In the same way that the RID/OPEID or other identifiers were communicated to the Main School, the additional locations for which these identifiers were generated would be sent those identifiers.
- **Comments and Considerations:** The communication of the RID to the School could be accomplished via an email to the POC but could also be transmitted in other manners to conform to security policies and the school's capabilities.

27. Communicate Eligibility to Schools

- **Description:** The affirmative Title IV eligibility determination is communicated to the school and its additional locations via the system's workflow capability.
- **Comments and Considerations:** Currently, Schools, once they have been determined eligible are given access to a report called the Eligibility Certification Approval Report (ECAR). The ECAR outlines for the School all of the Title IV

Program eligibility that the school has achieved. The enrollment system should provide a similar view of such information.

28. Submit Required Program Participation Agreements (PPA)

- **Description:** The PPA must be obtained, read, signed and two copies submitted by the School. FSA countersigns both copies, sending one back to the School and retaining the other.
- **Comments and Considerations:** The PPA is the contract that formalizes the agreements made regarding the school's Title IV arrangements. The enrollment system's workflow capability will guide the POC through the process. Depending on legal and regulatory considerations, the system may incorporate eSignature technology but other methods of signature submission will be available to schools as well. The PPA form is one that is required when Title IV eligibility is first granted and accepted by the school and also when substantial changes to a school's Title IV eligibility occur.

29. Receive and Store Signed Program Participation Agreement

- **Description:** The CMO Representative receives the signed PPA, countersigns, and stores it.
- **Comments and Considerations:** The PPA is a legal contract. The CMO internal guidelines govern the storage of the PPA once received.

30. Collect Program System Needs Data

- **Description:** The School has been identified as Title IV eligible and now must provide any additional information needed by the FSA systems to properly administer Title IV funds. The enrollment system asks the appropriate questions to obtain the information about a School's possible system access needs.
- **Comments and Considerations:** Schools are not necessarily familiar with each of FSA's systems. Therefore, wherever possible, the communication to the POC of which systems are accessible to the School is kept focused on programmatic needs. For example, in some cases, a POC will need access to "the Direct Loan Program Systems." A grouping of systems called the "Direct Loan Program Systems" may specifically include several related system (e.g. DLSS, DLCS etc.) and access would not have to be requested individually for each system for the POC to gain access to all.

31. Receive & Store Signed System Program Forms

- **Description:** The CMO Representative receives the signed forms and stores them. This step would encompass the sign-up for systems such as COD.
- **Comments and Considerations:** These forms may fall under the purview of the System Security Officers depending on how FSA chooses to arrange for their

review. Presently, System Security Officers review all system access requests on a system-by-system basis. The Access Management System would provide a centralized repository for information relating to Enterprise-wide access and identity management and may also eventually have provisions for dealing with the associated forms. Whatever policies are in place, however, the system's workflow capability will guide the forms through the process of sign-off requirements. The workflow capability would also identify and report instances where requests for access were not being handled in a timely manner.

32. System Security Officer Evaluation

- **Description:** This is a pre-defined process that exists outside of the enrollment initiative's scope. System Security Officers will utilize the system to track requests for system access and provide timely service to Trading Partner customers.[2]
- **Comments and Considerations:** The enrollment system's workflow will track the amount of days that elapse and will certainly allow System Security Officers to have a clear view of the items that require their review/attention. These evaluations may result in the need for the POC to provide additional security documentation/signatures but the System Security Officer would work with the POC to identify the need for any additional actions.
- **Comments and Considerations:** System Security Officers today report up to the Business Owners of a system. This reporting structure would require that a School sign up for several systems would need approval from each security officer prior to being able to utilize these systems. If a business process required access to several systems the enrollment process would be significantly hindered. Consideration should be given to reorganizing this group in order to administer security requirements at an Enterprise level and allow the process to be streamlined.

33. Approved by System Security Officer?

- **Description:** The System Security Officer must indicate whether or not they have approved the request(s) for access.
- **Comments and Considerations:** The System Security Officer process culminates when the System Security Officer signs-off on the request. By approving the request, the System Security Officer acknowledges that all other required signatures have been obtained. Frequently, one of the additional signatures that the System Security Officer must have before granting final approval is frequently that of the FSA Human Resources Representative. The inclusion of the Human Resources Representative indicates that FSA personnel

[2] All conceptual design references to System Security Officer roles and responsibilities are hypothetical and are not formal recommendations. The functions being described could be carried out by any number of individuals or organizations as FSA determines.

and contractors, or other prospective System Users have been received the required level of security clearance.

34. Notify POC & Resolve

- **Description:** The System Security Officer determines that the POC cannot be approved for the requested access and notifies the POC via the System's workflow capability.
- **Comments and Considerations:** In addition to the notification, the System Security Officer will identify the issues that have caused the request to be denied. The System Security Officer should also work with the requestor to resolve the issues and gain the needed access.

35. System Security Officer Updates Access Management System

- **Description:** The System Security Officer updates the Access Management System to reflect the designated administrator's access to the newly granted access status.
- **Comments and Considerations:** The Access Management System would have administrative interfaces for Systems Security Officers to provision users. The interface would allow the System Security Officer to make updates in an intuitive manner.

36. Systems Provisioned by Access Management System

- **Description:** The FSA Program Systems to which access has been granted are now provisioned to allow for access by the newly authorized POC.
- **Comments and Considerations:** By making the updates in the Access Management System, the System Security Officer has caused changes in the FSA systems to which the POC has been granted access. The types of provisioning functionality provided by an Access Management System are described in Section 2.3 - Description of Access Management Components of the Access Management High-Level Design (Deliverable 123.1.29).

37. Communicate Approval to POC

- **Description:** The POC, having been approved for access will have their System access information communicated to them via the Access Management System's workflow capability.
- **Comments and Considerations:** The communication of the access information to the School could be accomplished via an email to the POC but could also be transmitted in other manners to conform to security policies and the school's capabilities.

38. Complete Use & Log-off

- **Description:** The POC has now completed all Identification, Title IV, Program System and Security Processing steps and logs-off from the enrollment system.
- **Comments and Considerations:** The POC logs-off, and, as with every action the POC has taken while working within the system is time-stamped and logged for future review as needed.

4.4.2 Conceptual Lender Enrollment Diagram

The following diagram depicts the Business Activity Steps that an Individual User could follow to enroll with FSA in the high-level conceptual design.

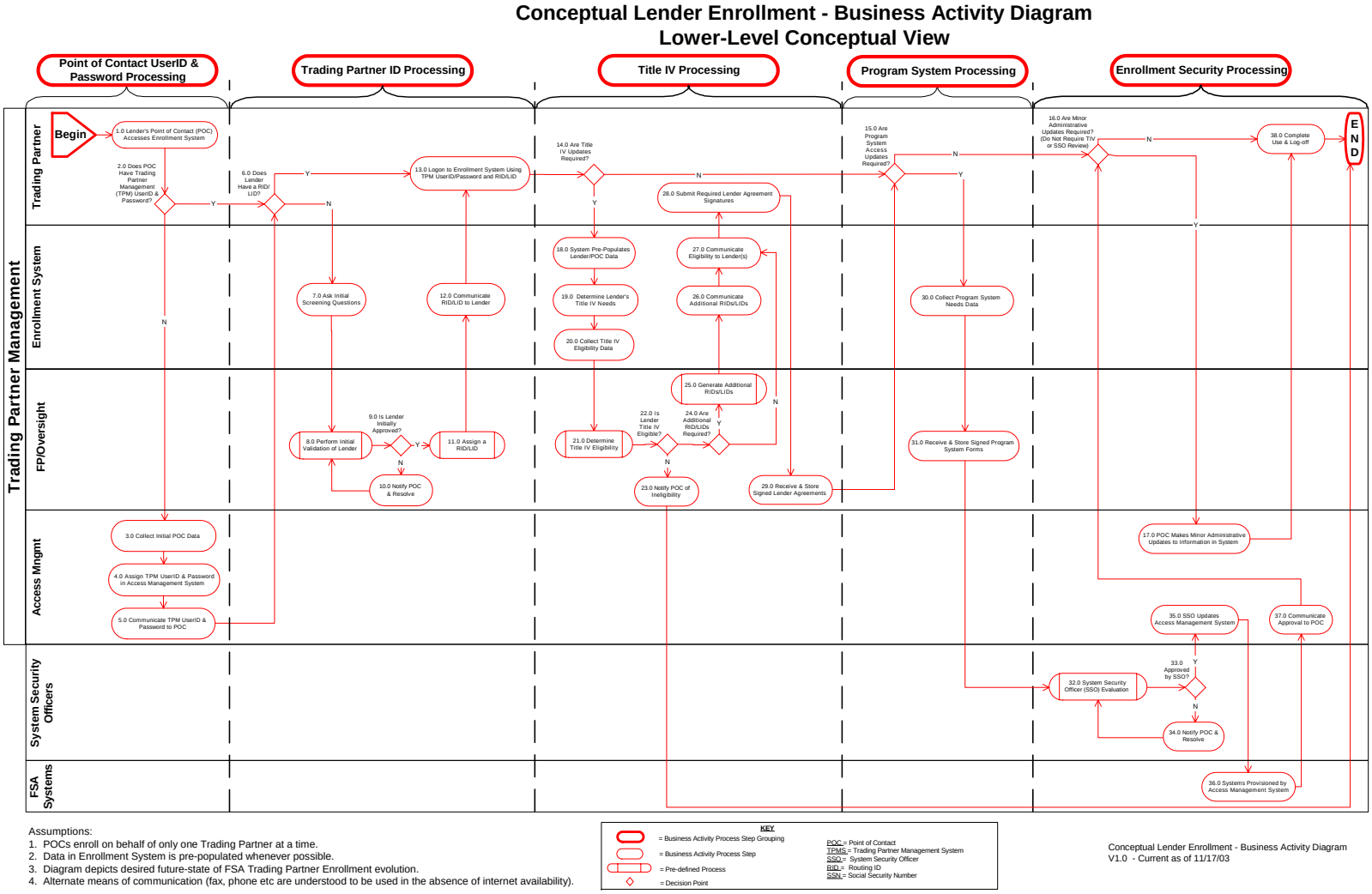


Figure 12 - Conceptual Lender Enrollment – Business Activity Diagram

The Lender Business Activity Diagram (see Figure 12 above) involves the following business activity access steps.

1. Lender POC Accesses Enrollment System

    - **Description:** The Lender's POC is the individual that is authorized to work with FSA on behalf of the Lender in order to complete the FSA enrollment process. The POC will initiate the enrollment process by logging onto the enrollment system. This URL will be the one point of entry to enroll or register a Trading Partner for use of FSA systems. Appropriate education and training sessions will be created to inform the Trading Partner POCs of the URL. Detailed design will determine the exact URL and links associated with it (e.g. FP Portal/IFAP).
    - **Comments and Considerations:** Some Lenders will need to have more than one individual work with FSA on their behalf. There are provisions for Lenders to have multiple users accessing the enrollment system. Because each individual will have their own TPM UserID & password, the system can allow for multiple authorized users while tracking which POC performs each individual transaction.

2. Does POC have a TPM UserID and password?

    - **Description:** The first question that the enrollment website would ask the Lender's POC is whether or not that individual has a TPM UserID and password.
    - **Comments and Considerations:** While the TPM solution has not yet been defined, it is likely that there will be a single UserID and password (the TPM UserID and password) for each of the individuals representing Trading Partners that may need to interact with FSA's Title IV programs or their associated systems.

3. Collect Initial POC Data
    - **Description:** If the POC indicates that they do not have a TPM UserID and password, they would be routed to the Access Management System. The Access Management System would collect initial demographic data about the POC. The demographic information collected during this step would be linked to the POC in the Access Management System from this point forward.
    - **Comments and Considerations:** Future consideration should be given to the possibility of incorporating a SSN screen at this step in the process. If this type of SSN screen were incorporated into the system, individuals who had been debarred would be immediately identified and disallowed to continue with the enrollment process.

4. Assign TPM UserID and password in Access Management System
    - **Description:** The assignment of a TPM UserID and password to the POC in the Access Management System is completed during this step. This is the same

UserID and password that the POC will use to access any part of the TPM solution.

- **Comments and Considerations:** The initial UserID & password assigned to the Trading Partner POC will be updated by the POC upon initial logon to the system and again at regular intervals.

5. Communicate TPM UserID & password to POC

- **Description:** Once the TPM UserID and password have been generated within the Access Management System, they will be communicated to the POC via email, phone or in another secure manner.
- **Comments and Considerations:** FSA has guidelines in place governing the communication of UserID & password information. These guidelines should be taken into account when developing the UserID and password communication capability. The enrollment system will initially utilize the workflow capability contained within the Access Management System.

6. Does the Lender have a RID/Lender ID (LID)?

- **Description:** This question requires the POC to determine whether the Trading Partner has a required RID/LID. In addition to the TPM password (which the POC already has at this point) the RID would link the POC to the appropriate Lender in order to complete the enrollment process.
- **Comments and Considerations:** It must be anticipated that the POC may not know if their Lender has a RID/LID. Therefore, the enrollment system will have a lookup table that will facilitate the research a POC could do online in order to best determine if their Lender has a RID. The lookup table would have to be sophisticated enough to search for possible RIDs on the basis of multiple possible search criteria including Lender name (and former names) or Lender Address. If, after having used the lookup table, it becomes clear that the Lender does not have a RID/LID, the POC would be directed to take steps to secure the Trading Partner ID on behalf of their Lender.
- **Comments and Considerations:** The end-state solution could utilize the RID and not the LID. However, the enrollment component will be developed in a flexible manner to handle either or both IDs.

7. Ask Initial Screening Questions

- **Description:** The enrollment system now asks the POC to provide some basic information about their Trading Partner. These are high-level questions that require the Lender to identify their basic demographic Trading Partner Information. In addition to the collection of demographic data, the Lender would be asked to indicate whether or not they have worked with a Guaranty Agency that will be supporting their request to become enrolled as a Lender.

- **Comments and Considerations:** The enrollment conceptual design indicates that FP oversight group will continue to perform the initial validation step for Lender Trading Partners. The information ascertained during these screening questions is similar to some of the data that is currently collected as part of the existing Lender Application Process (LAP). A debarment question may also be asked at this point in the process. For example, one of the questions could read as follows: "Have you or anyone else within your Lender's leadership ever been debarred?" The POC would also be reminded of other requirements, in particular, the regulation that governs Lenders, Section 435 (d) of the Higher Education Act of 1965.

8. Perform Initial Validation of Lender

- **Description:** This is a Pre-defined process step. At a minimum, the FP Representative ensures that the Lender is being supported by a valid Guaranty Agency. This validation is initial because there will be additional validation conducted by the FP Representative. Therefore, this initial validation step does not constitute the full and formal Title IV validation process. Instead, it is simply a means of gathering sufficient information that a RID/LID can be assigned. The formal Title IV decision is made by FP later in the overall enrollment process.
- **Comments and Considerations:** Additional work will be required to perform the validations needed by the RID solution and any other validations that FSA requires. The enrollment requirements for this step are simply to provide the appropriate information to the FP office in order for them to initially evaluate the request for a RID.

9. Is the Lender Initially Approved?

- **Description:** The System requires that a determination be made as to the initial Trading Partner ID Generation validity for the Lender. The FP Representative who has conducted the initial validation of the Lender's screening question information answers this question.
- **Comments and Considerations:** Based on the FP Representative's answering of this question, the Trading Partner ID Processing moves forward or is discussed in order to resolve issues that remain unresolved. FP Representatives must make this decision based upon their internal guidelines.

10. Notify POC & Resolve

- **Description:** If the Trading Partner were found by the FP Representative to be not initially approved, then the Representative would contact the POC to attempt to resolve whatever issues have been identified.
- **Comments and Considerations:** It may be that the issues identified cannot be resolved. If for example, the POC has been debarred, or the Trading Partner

appears to have a problematic history, the FP Representatives would take steps to deal with the apparent inappropriate attempt to gain access to FSA systems.

11. Assign a RID/LID

- **Description:** This is a pre-defined process that exists outside of the scope of the enrollment effort. The RID is a unique identifier for the Lender (or other Trading Partner) that provides a single reference number that all FSA systems, program offices and other partners must understand to be the same Lender. The RID is an eight-digit number that contains no additional meaning beyond being a constant and universal identifier for the Trading Partner to which it is assigned.
- **Comments and Considerations:** Other identifiers, including the LID may also be assigned at this point. Legacy identifiers may be phased out eventually but until such time as they are obsolete would be assigned at this point in the enrollment process.

12. Communicate RID/LID to Lender

- **Description:** The Lender, having been approved for a RID will have their RID communicated to them via the enrollment system's workflow capability.
- **Comments and Considerations:** The communication of the RID to the Lender could be accomplished via an email to the POC but could also be transmitted in other manners to comply with security policies and the Lender's capabilities.

13. Logon to Enrollment System Using TPM UserID and password and RID

- **Description:** The POC now utilizes their TPM UserID and password, along with the RID to access the enrollment system.
- **Comments and Considerations:** This UserID & password will be the same UserID & password used by the POC to conduct any TPM business on behalf of their Lender.

14. Title IV Updates Required?

- **Description:** Now that the Lender's POC has successfully logged onto the enrollment system, they indicate whether they have logged on to make updates or requests related to Title IV programs. For Lenders the only Title IV program is Federal Family Educational Loan (FFEL) Program.
- **Comment and Considerations:** An example of a Lender's need to perform such updates would include bank mergers, name changes, address changes or changes to a Lender's State to National Bank designation.
- **Comment and Considerations:** An example of a situation in which the POC would not need to make Title IV updates would be a scenario in which an eligible Lender logs onto the enrollment system to make minor demographic updates to the contact information stored within the Access Management System. Such

minor updates could include updates to the POC's email address or phone number but would not include a change of the Trading Partner's name or address.

15. Are Program System Access Updates Required?

- **Description:** The POC has either completed or bypassed the Title IV steps in the process and is now asked whether they have a need to gain new access for the POC to FSA Systems or need to modify POC access.
- **Comments and Considerations:** The type of FSA System access to which this question refers is access for the Lender's authorized enrollment POCs. Once the Lender's authorized enrollment POC has access to a given system, there are circumstances in which they can provide access to other users within the Lender organization. The role of Delegated Administrator within a Trading Partner's organization is detailed in Section 2.3 - Description of Access Management Components of the Access Management High-Level Design (Deliverable 123.1.29).

16. Are Minor Administrative Updates Required?

- **Description:** The POC is asked if the only updates that they need to make are minor updates to their personal demographic information.
- **Comments and Considerations:** Minor updates, such as updates to a POC's email address do not require FP review or review by the System Security Officer and such changes are immediately adopted by the system.

17. POC Makes Minor Updates to information in System

- **Description:** The POC, after identifying their need to make minor demographic updates in the system now does so.
- **Comments and Considerations:** No validation or approval is required for this type of change so upon completion of the changes, the POC proceeds to log out of the system.

18. System Pre-Populates Lender's Title IV Data

- **Description:** Any relevant data that has been provided by the POC or by any other authorized POCs for the Lender is pre-populated within the appropriate fields. The data that could be pre-populated would include any demographic information about the Lender and the POC as well as any other information that may have been previously entered into the system.
- **Comments and Considerations:** The enrollment system will always pre-populate data whenever possible. The pre-population of data is intended to reduce the amount of duplicative data entry for Trading Partners.

19. Determine Lender's Title IV Needs

- **Description:** FFEL is the only Title IV Program in which Lenders are able to enroll. The POC confirms that the program with which they are seeking to enroll is the FFEL Program.
- **Comments and Considerations:** The enrollment system will ask the single question about FFEL and will not require the user to address any questions about other Programs.

20. Collect Title IV Eligibility Data

- **Description:** The system now asks the POC to reaffirm their formal request to become a Title IV eligible Lender.
- **Comments and Considerations:** The primary eligibility data that prospective Lender will need to provide is the confirmation of the GA agreement. The FP Representative will likely have obtained the needed information on their own but would work with the POC to obtain any clarification or additional data that may be required.
- **Comments and Considerations:** Questions would also be asked of the Lender POC to determine whether or not the Lender will require additional RID/LIDs. Additional demographic data related to the additional RID/LID request would also be captured at this time.

21. Determine Title IV Eligibility

- **Description:** This is a pre-defined process that exists outside of the enrollment initiative's scope. The FP Representative reviews the Title IV eligibility of the Lender's formal request. Based on that review and FP's standards for eligibility, the FP Representative makes a Title IV eligibility determination.
- **Comments and Considerations:** The "initial validation" (Step 8.0) of the Lender's claim that they have been working with a GA can be made on the basis of the Lender POC's claim alone that they have worked with a GA. This more formal Title IV eligibility determination (Step 21.0) will be made on the basis of other confirmation that the supporting GA will or has signed the GA agreement with the Lender.
- **Comments and Considerations:** The FP Representative typically approves Lenders for eligibility but has certain standards that must be met. Some of the FP's considerations are driven by regulations such as Section 435(d) of the Higher Education Act of 1965. If a Lender is determined to be not Title IV eligible, the FP Representative contacts the Lender to identify to the Lender issues that exist. In addition to identifying issues to the Lender, the FP Representative will work with the Lender's POC to help the Lender take the appropriate actions to achieve Title IV eligibility.

22. Is the Lender Title IV Eligible?

- **Description:** The system requires the FP Representative to provide the answer to the question of Title IV eligibility for the Lender.
- **Comments and Considerations:** The FP Representative answers the question based on their understanding of the Lender's enrollment request and the applicable FP standards and policies.

23. Notify Lender (of Ineligibility)

- **Description:** If determined to be ineligible, the Lender is notified of the determination of Title IV determination.
- **Comments and Considerations:** The FP Representative makes the notification through the system's workflow capability. The FP Representative would indicate to the Lender that they "Have not met the requirements for Title IV eligibility at this time but should reapply once the issues have been addressed." The FP Representative also identifies the issues that have precluded the Lender's eligibility.

24. Are Additional RID/LIDs Required?

- **Description:** This decision box is a process step that routes the enrollment information differently depending on the information provided. If the need for additional RID/LIDs were identified, the enrollment system would route that information appropriately to generate additional RIDS/LIDs.
- **Comments and Considerations:** The data that the FP Representative needs to be able to make this determination has already been collected. The Lender POC should have identified whether they would require additional RID/LIDs when they input the Title IV eligibility data. Any future implementation should ensure that a RID/LID is assigned in order to properly track and monitor funds appropriately.

25. Generate Additional RIDs/LIDs

- **Description:** This is a Pre-defined Process. If additional RIDs, LIDs or other identifiers are required, the FP Representative will perform the function of generating additional IDs.
- **Comments and Considerations:** While the RID for the POC's Lender's main location was generated previously in the process, the RIDs for additional locations are not generated until this point because unless the main Lender is Title IV eligible, the additional RID/LIDs cannot be Title IV eligible.

26. Communicate Additional RID/LIDs

- **Description:** In the same way that the RID/LID or other identifiers were communicated to the Main Lender, the additional RID/LIDs are communicated via email.

- **Comments and Considerations:** The communication of the RID to the Lender could be accomplished via an email to the POC but could also be transmitted in other manners to conform to security policies and the Lender's capabilities.

27. Communicate Eligibility to Lenders

- **Description:** The affirmative Title IV eligibility determination is communicated to the Lender and its additional locations via the system's workflow capability.
- **Comments and Considerations:** The enrollment system should provide an option for Lenders to view the status of their Title IV eligibility information.

28. Submit Required Lender Agreements

- **Description:** The Lender Organizational Agreement (Lender OPA) must be obtained, read, signed and two copies submitted by the Lender or eligible Lender Trustee. FSA countersigns both copies, sending one back to the Lender and retaining the other.
- **Comments and Considerations:** The Lender OPA is the contract that formalizes the agreements made regarding the Lender's Title IV arrangements. The enrollment system's workflow capability will guide the User through the process. Depending on legal and regulatory considerations, the system may incorporate eSignature technology but other methods of signature submission will be available to Lenders as well. The Lender OPA is one that is required when Title IV eligibility is first granted and accepted by the Lender and also when substantial changes to a Lender's Title IV eligibility occur.
- There is a distinction between the Lender OPA and the GA Agreement that a Lender signs with a Guaranty Agency.

29. Receive and Store Signed Organizational Participation Agreement

- **Description:** The FP Representative receives the signed Lender OPA and stores it.
- **Comments and Considerations:** The Lender OPA is a legal contract. FP internal guidelines govern the storage of the OPA once received.

30. Collect Program System Needs Data

- **Description:** The Lender has been identified as Title IV eligible and now must provide any additional information needed by the FSA systems to properly administer Title IV funds. The enrollment system asks the appropriate questions to obtain the information about a Lender's possible system access needs.
- **Comments and Considerations:** FSA's systems are familiar to FSA but not necessarily the Lenders. Therefore, wherever possible, the communication to the POC of which systems are accessible to the Lender is kept focused on programmatic needs.

31. Receive & Store Signed System Program Forms

- **Description:** The FP Representative/System Security Officer now receives the signed forms and stores them. This would include the forms related to standards of conduct within the FMS system.
- **Comments and Considerations:** These forms may fall under the purview of the systems security officers depending on how FSA chooses to arrange for their review. Presently, System Security Officers review all system access requests on a system-by-system basis. The Access Management System would provide a centralized repository for information relating to Enterprise-wide access and identity management and may also eventually have provisions for dealing with the associated forms. Whatever policies are in place, however, the system's workflow capability will guide the forms through the process of sign-off requirements. The workflow capability would also identify and report instances where requests for access were not being handled in a timely manner.

32. System Security Officer Evaluation

- **Description:** This is a pre-defined process that exists outside of the enrollment initiative's scope. System Security Officers will utilize the system to track requests for system access and provide timely service to Trading Partner customers.
- **Comments and Considerations:** The enrollment system's workflow will track the amount of days that elapse and will allow System Security Officers to have a clear view of the items that require their review/attention. These evaluations may result in the need for the User to provide additional security documentation/signatures but the System Security Officer would work with the POC to identify the need for any additional actions.
- **Comments and Considerations:** System Security Officers today report up to the Business Owners of a system. This reporting structure would require that a Lender sign up for several systems and would need approval from each security officer prior to being able to utilize these systems. If a business process required access to several systems the enrollment process would be significantly hindered. Consideration should be given to reorganizing this group in order to administer security requirements at an Enterprise level and allow the process to be streamlined.

33. Approved by System Security Officer?

- **Description:** The System Security Officer must indicate whether or not they have approved the request(s) for access.
- **Comments and Considerations:** The System Security Officer process culminates when the System Security Officer signs-off on the request. By approving the request, the System Security Officer acknowledges that all other

required signatures have been obtained. Frequently, one of the additional signatures that the System Security Officer must have before granting final approval is frequently that of the FSA Human Resources Representative. The inclusion of the Human Resources Representative indicates that FSA personnel and contractors, or other prospective System Users have been received the required level of FSA Security clearance.

34. Notify POC & Resolve

- **Description:** The System Security Officer determines that the POC cannot be approved for the requested access and notifies the POC via the system's workflow capability.
- **Comments and Considerations:** In addition to the notification, the System Security Officer will identify the issues that have caused the request to be denied. The System Security Officer should also work with the requestor to resolve the issues and gain the needed access.

35. System Security Officer Updates the Access Management System

- **Description:** The System Security Officer updates the Access Management System to reflect the designated administrator's access to the newly granted access status.
- **Comments and Considerations:** The Access Management System would have administrative interfaces for Systems Security Officers to provision users. The interface would allow the System Security Officer to make updates in an intuitive manner.

36. Systems Provisioned by Access Management System

- **Description:** The FSA Program Systems to which access has been granted are now provisioned to allow for access by the newly authorized POC.
- **Comments and Considerations:** By making the updates in the Access Management System, the System Security Officer has caused changes in the FSA systems to which the POC has been granted access. The types of provisioning functionality provided by an Access Management System are described in Section 2.3 -Description of Access Management Components of the Access Management High-Level Design (Deliverable 123.1.29).

37. Communicate Approval to POC

- **Description:** The POC, having been approved for access will have their System access information communicated to them via the Access Management System's workflow capability.
- **Comments and Considerations:** The communication of the access information to the Lender could be accomplished via an email to the POC but could also be

transmitted in other manners to conform with security policies and the Lender's capabilities.

38. Complete Use & Log-off

- **Description:** The User has now completed all Identification, Title IV, Program System and Security Processing steps and logs-off from the enrollment system.
- **Comments and Considerations:** The POC logs-off, and, as with every action the POC has taken while working within the system is time-stamped and logged for future review as needed.

4.4.3 Conceptual Guaranty Agency Enrollment Diagram

The following diagram depicts the business activity steps that a Guaranty Agency could follow to enroll with FSA in the high-level conceptual design:

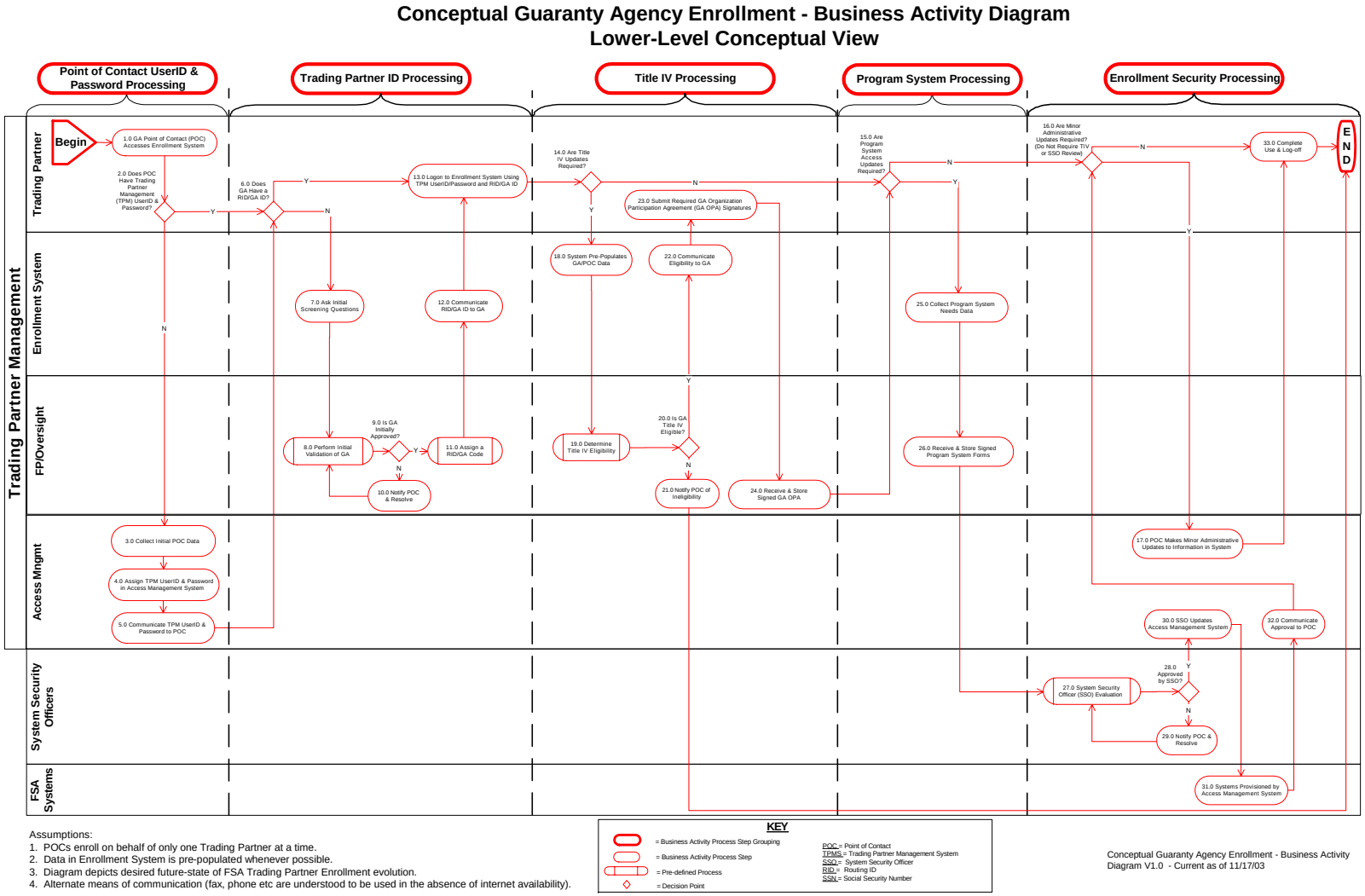


Figure 13 - Conceptual Guaranty Agency Enrollment – Business Activity Diagram

The GA Business Activity Diagram (Figure 13) involves the following Business Activity Process Steps.

1. GA POC Accesses Enrollment System

    - **Description:** The GA's POC is the individual that is authorized to work with FSA on behalf of the GA in order to complete the FSA enrollment process. The POC will initiate the enrollment process by logging onto the enrollment system. This URL will be the one point of entry to enroll or register a Trading Partner for use of FSA systems. Appropriate education and training sessions will be created to inform the Trading Partner POCs of the URL. Detailed design will determine the exact URL and links associated with it (e.g. FP Portal/IFAP).
    - **Comments and Considerations:** GAs may need to have more than one individual work with FSA on their behalf. There are provisions for GAs to have multiple users accessing the enrollment system. Because each individual will have their own TPM UserID & password, the system can allow for multiple authorized users while tracking which POC performs each individual transaction.

2. Does POC have a TPM UserID and password?

    - **Description:** The first question that the enrollment website would ask the GA's POC is whether or not that individual has a TPM UserID and password.
    - **Comments and Considerations:** While the TPM solution has not been defined, it is likely that there will be a single UserID and password (the TPM UserID and password) for each of the individuals representing Trading Partners that may need to interact with FSA's Title IV programs or their associated systems.

3. Collect Initial POC Data

    - **Description:** If the POC indicates that they have not obtained a TPM UserID and password, they would be routed to the Access Management System. The Access Management System would collect initial demographic data about the POC. The demographic information collected during this step would be linked to the POC in the Access Management System from this point forward.
    - **Comments and Considerations:** Future consideration should be given to the possibility of incorporating an SSN screen at this step in the process. If this type of SSN screen were incorporated into the system, individuals who had been debarred would be immediately identified and disallowed to continue with the enrollment process.

4. Assign TPM UserID and password in Access Management System

    - **Description:** The assignment of a TPM UserID and password to the POC in the Access Management System is completed during this step. This is the same

UserID and password that the POC will use to access any part of the TPM solution

- **Comments and Considerations:** The initial UserID & password assigned to the Trading Partner POC will be updated by the POC upon initial logon to the system and again at regular intervals.

5. Communicate TPM UserID & password to POC

- **Description:** Once the TPM UserID and password have been generated within the Access Management System, they will be communicated to the POC via email, phone or in another secure manner.
- **Comments and Considerations:** FSA has guidelines in place governing the communication of UserID & password information. These guidelines should be taken into account when developing the UserID and password communication capability. The enrollment system will initially utilize the workflow capabilities of the Access Management System and will be re-evaluated if an Enterprise workflow tool is later acquired by FSA.

6. Does the GA have a RID/GA ID?

- **Description:** This question requires the POC to determine whether the Trading Partner has a required RID/GA ID. Presently, there are only 36 active Guaranty Agencies approved to do business with FSA. New GAs would enroll very rarely.
- **Comments and Considerations:** In addition to the TPM password (which the POC already has at this point) the RID would link the POC to the appropriate GA in order to complete the enrollment process.
- **Comments and Considerations:** It must be anticipated that the POC may not know if their GA has a RID/GA ID. Therefore, the enrollment system will have a lookup table that will facilitate the research a POC could do online in order to best determine if their GA has a RID. The lookup table would have to be sophisticated enough to search for possible RIDs on the basis of multiple possible search criteria including GA name (and former names) or GA Address. If, after having used the lookup table, it becomes clear that the GA does not have a RID/GA ID, the POC would be directed to take steps to secure the Trading Partner ID on behalf of their GA.
- **Comments and Considerations:** The end-state solution could utilize the RID and not the GA ID. However, the enrollment system would need to be developed in a flexible manner to handle either or both IDs.

7. Ask Initial Screening Questions

- **Description:** The enrollment system now asks the POC to provide some basic information about their Trading Partner. These high-level questions require the GA to identify their basic demographic Trading Partner Information. In addition to the collection of demographic data, the GA would be asked the question “Have

you worked with a State Governor or Non Profit Organization?" This question refers to the fact that GAs must acquire a letter of endorsement from a Governor or Non-Profit in order to eventually be determined to be eligible. By asking the question regarding whether or not the prospective GA has begun to work with one of the required endorsing organizations. The POC will understand that they cannot proceed with the GA enrollment process unless they have taken the requisite preparatory steps.

- **Comments and Considerations:** The enrollment high-level design assumes that the Financial Partners oversight group will continue to perform the initial validation step for GA Trading Partners. It is anticipated that TPM will eventually streamline this process. A debarment question may also be asked at this point in the process. For example, one of the questions could read as follows: "Have you or anyone else within your GA's leadership ever been debarred?" The POC would also be reminded of other requirements, in particular, the regulation that governs GAs, Title IV Part B of the Higher Education Act of 1998.

8. Perform Initial Validation of GA

    - **Description:** This is a Pre-defined process step. At a minimum, the FP Representative ensures that the GA has been initially supported by a State Governor or Non-Profit. This validation is initial because there will be additional validation conducted by the FP Representative. Therefore, this initial validation step does not constitute the full and formal Title IV validation process. Instead, it is simply a means of gathering sufficient information that a RID/GA ID can be assigned. The formal Title IV decision is made by FP later in the overall enrollment process.
    - **Comments and Considerations:** Additional work will be required to perform the validations needed for RID generation and any other validations that FSA requires. The enrollment system requirements for this step are simply to provide the appropriate information to the FP office in order for them to initially evaluate the request for a RID.

9. Is the GA Initially Approved?

    - **Description:** The System requires that a determination be made as to the initial Trading Partner ID Generation validity for the GA. The FP Representative who has conducted the initial validation of the GA's screening question information answers this question.
    - **Comments and Considerations:** Based on the FP Representative's answering of this question, the Trading Partner ID Processing moves forward or is discussed in order to resolve issues that remain unresolved. FP Representatives must make this decision based upon their internal guidelines. Ultimately, in order to become a GA, the regulations in Title IV, Section B of the Higher Education Act of 1965 must be met.

- **Comments and Considerations:** In order for the prospective GA to be granted a RID, the FP Representative is not required to exhaustively confirm detailed compliance with each of the regulation's requirements. Such detailed assessments will be made when Title IV eligibility is being formally determined (Step 19 of the GA Enrollment Diagram). At this point, to be granted a RID, the GA POC must only have answered the screening question satisfactorily.

10. Notify POC & Resolve

- **Description:** If the Trading Partner were found by the FP Representative to be initially ineligible, then the Representative would contact the POC to attempt to resolve whatever issues have been identified.
- **Comments and Considerations:** It may be that the issues identified cannot be resolved. If, for example, the POC has been debarred, or the Trading Partner appears to have a problematic history, the FP Representatives would take steps to deal with the apparent inappropriate attempt to gain access to FSA systems.

11. Assign a RID/GA ID

- **Description:** This is a pre-defined process that exists outside of the scope of the enrollment effort. The RID is a unique identifier for the GA (or other Trading Partner) that provides a single reference number that all FSA systems, program offices and other partners must understand to be the same GA. The RID is an eight-digit number that contains no additional meaning beyond being a constant and universal identifier for the Trading Partner to which it is assigned.
- **Comments and Considerations:** Other identifiers, including the GA ID may also be assigned at this point. Legacy identifiers may be phased out eventually but until such time as they are obsolete would be assigned at this point in the enrollment process. FP will likely continue to perform this function.

12. Communicate RID/GA ID to GA

- **Description:** The GA, having been approved for a RID will have their RID communicated to them via the enrollment system's workflow capability.
- **Comments and Considerations:** The communication of the RID to the GA could be accomplished via an email to the POC but could also be transmitted in another manner to comply with security policies and the GA's capabilities.

13. Logon to Enrollment System Using TPM UserID and password and RID

- **Description:** The POC now utilizes their TPM UserID and password, along with the RID, to access the enrollment system.
- **Comments and Considerations:** This UserID & password will be the same UserID & password used by the POC to conduct any TPM business on behalf of their GA.

14. Title IV Updates Required?

- **Description:** Now that the GA's POC has successfully logged onto the enrollment system, they indicate whether they need to make updates or requests related to Title IV programs.
- **Comments and Considerations:** An example of a situation in which the POC would not need to make Title IV updates would be a scenario in which an eligible GA logs onto the enrollment system to make minor demographic updates to the contact information stored within the Access Management System. Such minor updates could include updates to the POC's email address or phone number but would not include a change of the Trading Partner's name or address.

15. Are Program System Access Updates Required?

- **Description:** The POC has now either completed or bypassed the Title IV steps in the process and is asked the question of whether they need to gain new access for the POC to FSA Systems or need to modify POC access.
- **Comments and Considerations:** The type of FSA System access to which this question refers is access for the GA's authorized enrollment POCs. Once the GA's authorized enrollment POC has access to a given system, there are circumstances in which they can provide access to other users within the GA organization. The role of Delegated Administrator within a Trading Partner's organization is detailed in Section 2.3 - Description of Access Management Components of the Access Management High-Level Design (Deliverable 123.1.29).

16. Are Minor Administrative Updates Required?

- **Description:** The POC is asked if the only updates that they need to make are minor updates to their personal demographic information.
- **Comments and Considerations:** Minor updates, such as updates to a POC's email address do not require FP review or review by the System Security Officer and such changes are immediately adopted by the system.

17. POC Makes Minor Updates to information in System

- **Description:** The POC, having identified their need to make minor demographic updates in the system now does so.
- **Comments and Considerations:** No validation or approval is required for this type of change so upon completion of the changes, the POC proceeds to log out of the system.

18. System Pre-Populates GA's Title IV Data

- **Description:** Any relevant data that has been provided by the POC or by any other authorized POCs for the GA is pre-populated within the appropriate fields. The data that could be pre-populated would include any demographic information about the GA and the POC as well as any other information that may have been previously entered into the system.
- **Comments and Considerations:** The enrollment system will always pre-populate data, whenever possible. The pre-population of data is intended to reduce the amount of duplicative data entry for Trading Partners. In the case of the GA, all of the data required to make a Title IV eligibility determination has already been collected.

19. Determine Title IV Eligibility

- **Description:** This is a pre-defined process that exists outside of the enrollment initiative's scope. The FP Representative reviews the GA's formal Title IV request. Based on that information and on FP's standards for eligibility, the FP Representative makes a Title IV eligibility determination.
- **Comments and Considerations:** The "initial validation" (Step 8.0 of the GA Enrollment Diagram) can move forward based on little more than the claim of the POC that they are working with a Governor or Non-Profit, but before the GA is determined to be truly Title IV eligible, there must be a confirmation by the FP Representative that the GA has been formally endorsed.
- **Comments and Considerations:** The FP Representative, with the Secretary of Education's endorsement, typically approves GAs for eligibility but has certain standards that must be met. Some of the FP's considerations are driven by regulations such as in Title IV, Section B of the Higher Education Act of 1965. If a GA is determined to be not Title IV eligible, the FP Representative contacts the GA to identify to the GA where the issues exist. In addition to identifying for the GA the issues that exist, the FP Representative will work with the GA's POC to help them take the appropriate actions to achieve Title IV eligibility.

20. Is the GA Title IV Eligible?

- **Description:** The system requires the FP Representative to provide the answer to the question of Title IV eligibility for the GA.
- **Comments and Considerations:** The FP Representative answers the question based on their understanding of the GA's enrollment request and the applicable FP standards and policies.

21. Notify GA (of Ineligibility)

- **Description:** The GA must be notified of the determination that they have not achieved Title IV eligibility.
- **Comments and Considerations:** The FP Representative makes the notification through the system's workflow capability. The FP Representative would indicate

to the GA that they "Have not met the requirements for Title IV eligibility at this time but should reapply once the issues have been addressed". The FP Representative also identifies the issues that have precluded the GA's eligibility.

22. Communicate Eligibility to GA

- **Description:** The affirmative Title IV eligibility determination is communicated to the GA via the system's workflow capability.
- **Comments and Considerations:** The enrollment system should provide an option for GAs to view the status of their Title IV eligibility information.

23. Submit Required GA Agreements

- **Description:** The GA Agreements must be obtained, read, signed and submitted by the GA.
- **Comments and Considerations:** The GA Organizational Participation Agreement (GA OPA) is the contract that formalizes the agreements made regarding the GA's Title IV arrangements. The enrollment system's workflow capability will guide the User through the process. Depending on legal and regulatory considerations, the system may incorporate eSignature technology but other methods of signature submission will be available to GAs as well. The GA OPA is required when Title IV eligibility is first granted and accepted by the GA and also when substantial changes to a GA's Title IV eligibility occur.

24. Receive and Store Signed Program Participation Agreement

- **Description:** The FP Representative receives the signed GA OPA, countersigns, and stores it.
- **Comments and Considerations:** The GA OPA is a legal contract. FP internal guidelines govern the storage of the PPA once received.

25. Collect Program System Needs Data

- **Description:** The GA has been identified as Title IV eligible and now must provide any additional information needed by the FSA systems to properly administer Title IV funds. The enrollment system asks the appropriate questions to obtain the information about a GA's possible system access needs.
- **Comments and Considerations:** FSA's systems are familiar to FSA but not necessarily the GAs. Therefore, wherever possible, the communication to the POC of which systems are accessible to the GA is kept focused on programmatic needs.

26. Receive & Store Signed System Program Forms

- **Description:** The FP Representative/System Security Officer now receives the signed forms and stores them. This would include the forms related to standards of conduct within the FMS system.
- **Comments and Considerations:** These forms may fall under the purview of the systems security officers depending on how FSA chooses to arrange for their review. Presently, System Security Officers review all system access requests on a system-by-system basis. The Access Management System would provide a centralized repository for information relating to Enterprise-wide access and identity management and may also eventually have provisions for dealing with the associated forms. Whatever policies are in place, however, the system's workflow capability will guide the forms through the process of sign-off requirements. The workflow capability would also identify and report instances where requests for access were not being handled in a timely manner.

27. System Security Officer Evaluation

- **Description:** This is a pre-defined process that exists outside of the enrollment initiative's scope. System Security Officers will utilize the system to track requests for system access and provide timely service to Trading Partner customers.
- **Comments and Considerations:** The enrollment system's workflow will track the amount of days that elapse and will allow System Security Officers to have a clear view of the items that require their review/attention. These evaluations may result in the need for the POC to provide additional security documentation/signatures but the System Security Officer would work with the POC to identify the need for any additional actions.
- **Comments and Considerations:** System Security Officers today report up to the Business Owners of a system. This reporting structure means that GAs currently need multiple system approvals the various security officer prior to being able to utilize these systems. If a business process required access to several systems the enrollment process would be significantly hindered. Consideration should be given to reorganizing this group in order to administer security requirements at an Enterprise level and allow the process to be streamlined.

28. Approved by System Security Officer?

- **Description:** The System Security Officer process culminates when the System Security Officer signs-off on the request. By approving the request, the System Security Officer acknowledges that all other required signatures have been obtained. Frequently, one of the additional signatures that the System Security Officer must have before granting final approval is frequently that of the FSA Human Resources Representative. The inclusion of the Human Resources Representative indicates that FSA personnel and contractors, or other prospective System Users have received the required level of Human Resources clearance

- **Comments and Considerations:** The System Security Officer process culminates when the System Security Officer signs-off on the request. By approving the request, the System Security Officer acknowledges that all other required signatures have been obtained. Frequently, one of the additional signatures that the System Security Officer must have before granting final approval is frequently that of the FSA Human Resources Representative. The inclusion of the Human Resources Representative indicates that FSA personnel and contractors, or other prospective system users have received the required level of FSA Security clearance.

29. Notify POC & Resolve

- **Description:** The System Security Officer determines that the POC cannot be approved for the requested access and notifies the POC via the System's workflow capability.
- **Comments and Considerations:** In addition to the notification, the System Security Officer will identify the issues that have caused the request to be denied. The System Security Officer should also work with the requestor to resolve the issues and gain needed access.

30. System Security Officer Updates Access Management System

- **Description:** The System Security Officer updates the Access Management System to reflect the designated administrator's access to the newly granted access status.
- **Comments and Considerations:** The Access Management System would have administrative interfaces for Systems Security Officers to provision users. The interface would allow the System Security Officer to make updates in an intuitive manner.

31. Systems Provisioned by Access Management System

- **Description:** The FSA Program Systems to which access has been granted are now provisioned to allow for access by the newly authorized POC.
- **Comments and Considerations:** By making the updates in the Access Management System, the System Security Officer has caused changes in the FSA systems to which the POC has been granted access. The types of provisioning functionality provided by an Access Management System are described in Section 2.3 - Description of Access Management Components of the Access Management High-Level Design (Deliverable 123.1.29).

32. Communicate Approval to POC

- **Description:** After being approved for access, the POC will have their System access information communicated to them via the Access Management System's workflow capability.
- **Comments and Considerations:** The communication of the access information to the GA could be accomplished via an email to the POC but could also be transmitted in other manners to conform with security policies and the GA's capabilities.

33. Complete Use & Log-off

- **Description:** The User has now completed all Identification, Title IV, Program System and Security Processing steps and logs-off from the enrollment system.
- **Comments and Considerations:** The POC logs-off, and, as with every action the POC has taken while working within the system is time-stamped and logged for future review as needed.

4.4.4 Conceptual State Agency Enrollment Diagram

The following diagram depicts the business activity steps that a State Agency could follow to enroll with FSA in the high-level conceptual design:

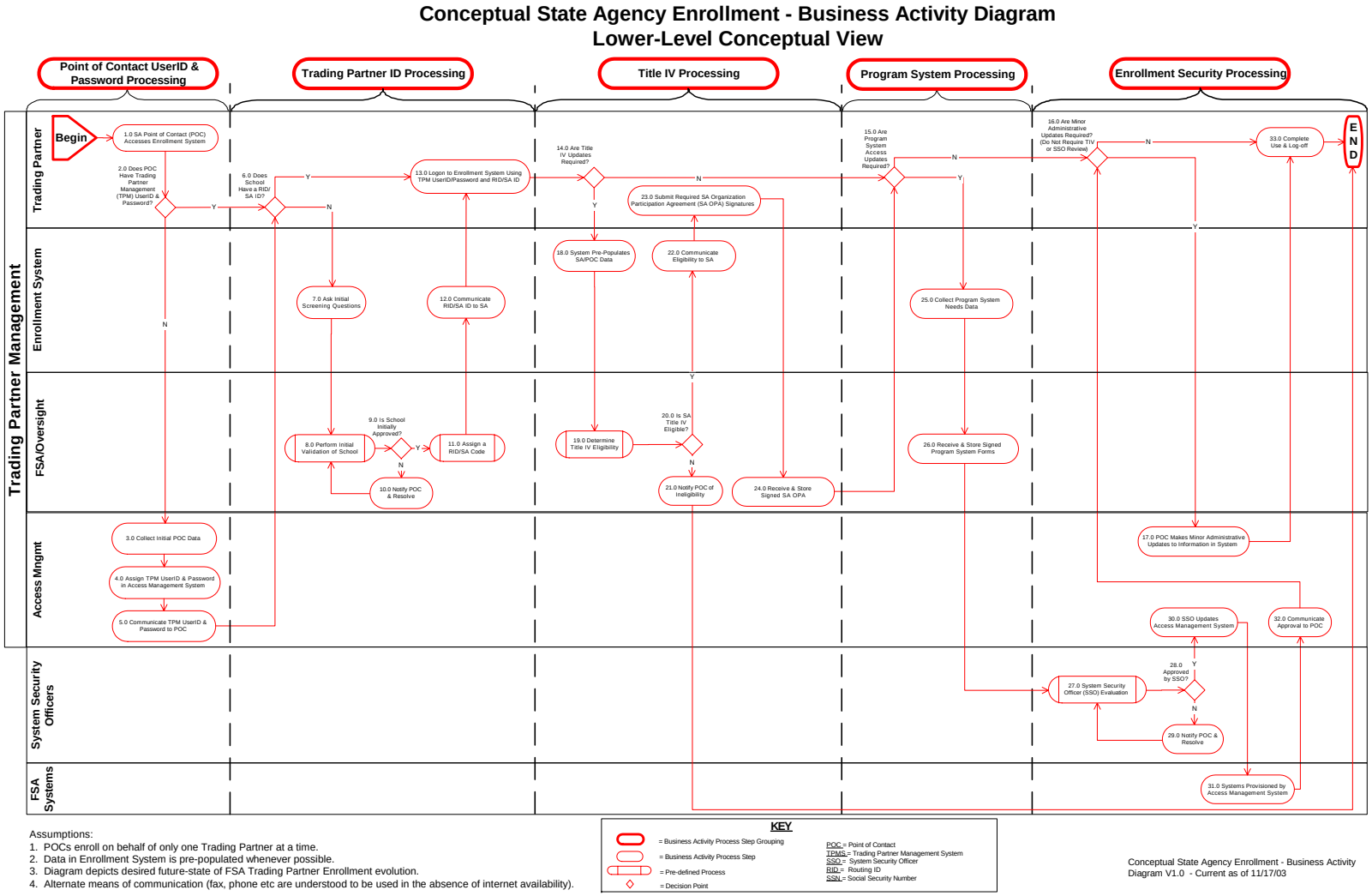


Figure 14 - Conceptual State Agency Enrollment – Business Activity Diagram

State Agency Business Activity Diagram (Figure 14) involves the following Business Activity Process Steps.

1. State Agency POC Accesses Enrollment System

    - **Description:** The State Agency's POC is the individual that is authorized to work with FSA on behalf of the State Agency in order to complete the FSA enrollment process. The POC will initiate the enrollment process by logging onto the enrollment system. This URL will be the one point of entry to enroll or register a Trading Partner for use of FSA systems. Appropriate education and training sessions will be created to inform the Trading Partner Points of Contact of the URL. Detailed design will determine the exact URL and links associated with it (e.g. IFAP).
    - **Comments and Considerations:** State Agencies may need to have more than one individual work with FSA on their behalf. There are provisions for State Agencies to have multiple users accessing the enrollment system. Because each individual will have their own TPM UserID & password, the system can allow for multiple authorized users while tracking which POC performs each individual transaction.

2. Does POC have a TPM UserID and password?

    - **Description:** The first question that the enrollment website would ask the State Agency's POC is whether or not that individual has a TPM UserID and password.
    - **Comments and Considerations:** While the TPM solution has not yet been defined, it is likely that there will be a single UserID and password (the TPM UserID and password) for each of the individuals representing Trading Partners that may need to interact with FSA's Title IV programs or their associated systems.

3. Collect Initial POC Data

    - **Description:** If the POC indicates that they do not have a TPM UserID and password, they would be routed to the Access Management System. The Access Management System would collect initial demographic data about the POC. The demographic information collected during this step would be linked to the POC in the Access Management System from this point forward.
    - **Comments and Considerations:** Future consideration should be given to the possibility of incorporating an SSN screen at this step in the process. If this type of SSN screen were incorporated into the system, individuals who had been debarred would be immediately identified and disallowed to continue with the enrollment process.

4. Assign TPM UserID and password in Access Management System

- **Description:** The assignment of a TPM UserID and password to the POC in the Access Management System is completed during this step. This is the same UserID and password that the POC will use to access any part of the TPM solution
- **Comments and Considerations:** The initial UserID & password assigned to the Trading Partner POC will be updated by the POC upon initial logon to the system and again at regular intervals.

5. Communicate TPM UserID & password to POC

- **Description:** Once the TPM UserID and password have been generated within the Access Management System, they will be communicated to the POC via email, phone or in another secure manner.
- **Comments and Considerations:** FSA has guidelines in place governing the communication of UserID & password information. These guidelines should be taken into account when developing the UserID and password communication capability. The enrollment system will initially utilize the workflow capability contained within the Access Management System.

6. Does the State Agency have a RID/State Agency ID?

- **Description:** This question requires the POC to determine whether the Trading Partner has a required RID/State Agency ID. New State Agencies would enroll very rarely.
- **Comments and Considerations:** In addition to the TPM password (which the POC already has at this point) the RID would link the POC to the appropriate State Agency in order to complete the enrollment process.
- **Comments and Considerations:** It must be anticipated that the POC may not know if their State Agency has a RID/State Agency ID. Therefore, the enrollment system will have a lookup table that will facilitate the research a POC could do online in order to best determine if their State Agency has a RID. The lookup table would have to be sophisticated enough to search for possible RIDs on the basis of multiple possible search criteria including State Agency name (and former names) or State Agency Address. If, after having used the lookup table, it becomes clear that the State Agency does not have a RID/State Agency ID, the POC would be directed to take steps to secure the Trading Partner ID on behalf of their State Agency.
- **Comments and Considerations:** The end-state solution could utilize the RID and not the State Agency ID.

7. Ask Initial Screening Questions

- **Description:** The enrollment system now asks the POC to provide some basic information about their Trading Partner. These are high-level questions that

require the State Agency to identify their basic demographic Trading Partner Information. In addition to the collection of demographic data, the State Agency would be asked the question "Have you worked with a State Governor or Non-Profit that will be supporting this request for Title IV eligibility". This question refers to the fact that State Agencies must acquire a letter of endorsement from a Governor or Non-Profit in order to eventually be determined to be eligible. By asking the question regarding whether the prospective State Agency has begun to work with one of the required endorsing organization POCs will understand that they cannot proceed with the State Agency enrollment process unless they have taken the requisite preparatory steps.

- **Comments and Considerations:** The enrollment high-level design assumes that an FSA oversight group will continue to perform the initial validation step for State Agency Trading Partners. A debarment question may also be asked at this point in the process. For example, one of the questions could read as follows: "Have you or anyone else within your State Agency's leadership ever been debarred?" The POC would also be reminded of other requirements, in particular, the regulation that governs State Agencies, Title IV Part 603 of the Higher Education Act of 1965.

8. Perform Initial Validation of State Agency

    - **Description:** This is a Pre-defined process step. At a minimum, the FP Representative ensures that the State Agency has been initially supported by a State Governor or Non-Profit. This validation is initial because there will be additional validation conducted by the FP/FSA Representative. Therefore, this initial validation step does not constitute the full and formal Title IV validation process. Instead, it is simply a means of gathering sufficient information that a RID/State Agency ID can be assigned. The formal Title IV decision is made by FP later in the overall enrollment process.
    - **Comments and Considerations:** Additional work will be required to perform the validations needed by the RID solution and any other validations that FSA requires. The enrollment system requirements for this step are simply to provide the appropriate information to the FP office in order for them to initially evaluate the request for a RID.

9. Is the State Agency Initially Approved?

    - **Description:** The System requires that a determination be made as to the initial Trading Partner ID Generation validity for the State Agency. The FP Representative who has conducted the initial validation of the State Agency's screening question information answers this question.
    - **Comments and Considerations:** Based on the FP Representative's answering of this question, the Trading Partner ID processing moves forward or is discussed in order to resolve issues that remain unresolved. FP Representatives must make this decision based upon internal guidelines. Ultimately, in order to become a

State Agency, the regulations in Title IV Part 603 of the Higher Education Act of 1965 must be met.

- **Comments and Considerations:** In order to be granted an RID, the FP Representative is not required to exhaustively confirm detailed compliance with each of the regulation's requirements. Such detailed assessments will be made when Title IV eligibility is being formally determined (Step 19 in the State Agency Enrollment Diagram). At this point, to be granted a RID, the State Agency POC must only have answered the screening question satisfactorily.

10. Notify POC & Resolve

- **Description:** If the Trading Partner were found by the FP Representative to be initially ineligible, then the Representative would contact the POC to attempt to resolve whatever issues have been identified.
- **Comments and Considerations:** It may be that the issues identified cannot be resolved. If for example, the POC has been debarred, or the Trading Partner appears to have a problematic history, the FP Representatives would take steps to deal with the apparent inappropriate attempt to gain access to FSA systems.

11. Assign a RID/State Agency ID

- **Description:** This is a pre-defined process that exists outside of the scope of the enrollment effort. The RID is a unique identifier for the State Agency (or other Trading Partner) that provides a single reference number that all FSA systems, program offices, and other partners must understand to be the same State Agency. The RID is an eight-digit number that contains no additional meaning beyond being a constant and universal identifier for the Trading Partner to which it is assigned.
- **Comments and Considerations:** Other identifiers, including the State Agency ID may also be assigned at this point. Legacy identifiers may be phased out eventually but until such time as they are obsolete would be assigned at this point in the enrollment process.

12. Communicate RID/State Agency ID to State Agency

- **Description:** The State Agency, having been approved for a RID will have their RID communicated to them via the enrollment system's workflow capability.
- **Comments and Considerations:** The communication of the RID to the State Agency could be accomplished via an email to the POC but could also be transmitted in other manners to comply with security policies and the State Agency's capabilities.

13. Logon to Enrollment System Using TPM UserID and password and RID

- **Description:** The POC now utilizes their TPM UserID and password, along with the RID to access the enrollment system.
- **Comments and Considerations:** This UserID & password will be the same UserID & password used by the POC to conduct any TPM business on behalf of their State Agency.

14. Title IV Updates Required?

- **Description:** Now that the State Agency's POC has successfully logged onto the enrollment system, they indicate whether they have logged on to make updates or requests related to Title IV programs.
- **Comments and Considerations:** An example of a situation in which the POC would not need to make Title IV updates would be a scenario in which an eligible State Agency logs onto the enrollment system to make minor demographic updates to the contact information stored within the Access Management System. Such minor updates could include updates to the POC's email address or phone number but would not include a change of the Trading Partner's name or address.

15. Are Program System Access Updates Required?

- **Description:** The POC has now either completed or bypassed the Title IV steps in the Diagram and is asked the question of whether they have a need to gain new access for the POC to FSA Systems or need to modify POC access.
- **Comments and Considerations:** The type of FSA System access to which this question refers is access for the State Agency's authorized enrollment POCs. Once the State Agency's authorized enrollment POC has access to a given system, there are circumstances in which they can provide access to other users within the State Agency organization. The role of Delegated Administrator within a Trading Partner's organization is detailed in Section 2.3 - Description of Access Management Components of the Access Management High-Level Design (Deliverable 123.1.29).

16. Are Minor Administrative Updates Required?

- **Description:** The POC is asked if the only updates that they need to make are minor updates to their personal demographic information.
- **Comments and Considerations:** Minor updates, such as updates to a POC's email address do not require FP review or review by the System Security Officer and such changes are immediately adopted by the system.

17. POC Makes Minor Updates to information in System

- **Description:** The POC, having identified their need to make minor demographic updates in the system now does so.

- **Comments and Considerations:** No validation or approval is required for this type of change so upon completion of the changes, the POC proceeds to log out of the system.

18. System Pre-Populates State Agency's Title IV Data

- **Description:** Any relevant data that has been provided by the POC or by any other authorized POCs for the State Agency is pre-populated within the appropriate fields. The data that could be pre-populated would include any demographic information about the State Agency and the POC as well as any other information that may have been previously entered into the system.
- **Comments and Considerations:** The enrollment system will always pre-populate data whenever possible. The pre-population of data is intended to reduce the amount of duplicative data entry for Trading Partners. In the case of the State Agency, all of the data required to make a Title IV eligibility determination has already been collected.

19. Determine Title IV Eligibility

- **Description:** This is a pre-defined process that exists outside of the enrollment initiative's scope. The FP Representative reviews the State Agency's formal Title IV request. Based on that information and on FP's standards for eligibility, the FP Representative makes a Title IV eligibility determination.
- **Comments and Considerations:** The "initial validation" (Step 8.0 of the State Agency Enrollment Diagram) can move forward based on little more than the claim of the POC that they are working with a Governor or Non-Profit, but before the State Agency is determined to be truly Title IV eligible, there must be a confirmation by the FP Representative that the State Agency has been formally endorsed.
- **Comments and Considerations:** The FP Representative, with the Secretary of Education's endorsement, typically approves State Agencies for eligibility but has certain standards that must be met. Some of the FP's considerations are driven by regulations such as Title IV Part 603 of the Higher Education Act of 1965. If a State Agency is determined to be not Title IV eligible, the FP Representative contacts the State Agency to identify to the State Agency where the issues exist. In addition to identifying for the State Agency the issues that exist, the FP Representative will work with the State Agency's POC to help them take the appropriate actions to achieve Title IV eligibility.

20. Is the State Agency Title IV Eligible?

- **Description:** The system requires the FP Representative to provide the answer to the question of Title IV eligibility for the State Agency.

- **Comments and Considerations:** The FP Representative answers the question based on their understanding of the State Agency's enrollment request and the applicable FP standards and policies.

21. Notify State Agency (of Ineligibility)

- **Description:** The State Agency must be notified of the determination that they have not achieved Title IV eligibility.
- **Comments and Considerations:** The FP Representative makes the notification through the system's workflow capability. The FP Representative would indicate to the State Agency that they "Have not met the requirements for Title IV eligibility at this time but should reapply once the issues have been addressed". The FP Representative also identifies the issues that have precluded the State Agency's eligibility.

22. Communicate Eligibility to State Agency

- **Description:** The affirmative Title IV eligibility determination is communicated to the State Agency via the system's workflow capability.
- **Comments and Considerations:** The enrollment system should provide an option for State Agencies to view the status of their Title IV eligibility information.

23. Submit Required State Agency Agreements

- **Description:** The State Agency Agreements must be obtained, read, signed and submitted by the State Agency.
- **Comments and Considerations:** The State Agency Organizational Participation Agreement (State Agency OPA) formalizes the agreements made regarding the State Agency's Title IV arrangements. The enrollment system's workflow capability will guide the POC through the process. Depending on legal and regulatory considerations, the system may incorporate eSignature technology but other methods of signature submission will be available to State Agencies as well. The State Agency OPA is required when Title IV eligibility is first granted and accepted by the State Agency and also when substantial changes to a State Agency's Title IV eligibility occur.

24. Receive and Store Signed Program Participation Agreement

- **Description:** The FP Representative receives the signed State Agency OPA, countersigns, and stores it.
- **Comments and Considerations:** The State Agency OPA is a legal contract. FP internal guidelines govern the storage of the PPA once received.

25. Collect Program System Needs Data

- **Description:** The State Agency has been identified as Title IV eligible and now must provide any additional information needed by the FSA systems to properly administer Title IV funds. The enrollment system asks the appropriate questions to obtain the information about a State Agency's possible system access needs.
- **Comments and Considerations:** FSA's systems are familiar to FSA but not necessarily the State Agencies. Therefore, wherever possible, the communication to the POC of which systems are accessible to the State Agency is kept focused on programmatic needs.

26. Receive & Store Signed System Program Forms

- **Description:** The FP Representative/System Security Officer now receives the signed forms and stores them. This would include the forms related to standards of conduct within the FMS system.
- **Comments and Considerations:** These forms may fall under the purview of the systems security officers depending on how FSA chooses to arrange for their review. Presently, System Security Officers review all system access requests on a system-by-system basis. The Access Management System would provide a centralized repository for information relating to Enterprise-wide access and identity management. Whatever policies are in place, however, the system's workflow capability will guide the forms through the process of sign-off requirements. The workflow capability would also identify and report instances where requests for access were not being handled in a timely manner.

27. System Security Officer Evaluation

- **Description:** This is a pre-defined process that exists outside of the enrollment initiative's scope. System Security Officers will utilize the system to track requests for system access and provide timely service to Trading Partner customers.
- **Comments and Considerations:** The enrollment system's workflow will track the amount of days that elapse and will certainly allow System Security Officers to have a clear view of the items that require their review/attention. These evaluations may result in the need for the POC to provide additional security documentation/signatures but the System Security Officer would work with the POC to identify the need for any additional actions.
- **Comments and Considerations:** System Security Officers today report up to the Business Owners of a system. This reporting structure would require that a State Agency sign up for several systems would need approval from each security officer prior to being able to utilize these systems. If a business process required access to several systems the enrollment process would be significantly hindered. Consideration should be given to reorganizing this group in order to administer security requirements at an Enterprise level and allow the process to be streamlined.

28. Approved by System Security Officer?

- **Description:** The System Security Officer process culminates when the System Security Officer signs-off on the request. By approving the request, the System Security Officer acknowledges that all other required signatures have been obtained. Frequently, one of the additional signatures that the System Security Officer must have before granting final approval is frequently that of the FSA Human Resources Representative. The inclusion of the Human Resources Representative indicates that FSA personnel and contractors, or other prospective System Users have received the required level of Human Resources clearance
- **Comments and Considerations:** The System Security Officer process culminates when the System Security Officer signs-off on the request. By approving the request, the System Security Officer acknowledges that all other required signatures have been obtained. Frequently, one of the additional signatures that the System Security Officer must have before granting final approval is frequently that of the FSA Human Resources Representative. The inclusion of the Human Resources Representative indicates that FSA personnel and contractors, or other prospective System Users have been received the required level of Human Resources clearance

29. Notify POC & Resolve

- **Description:** The System Security Officer determines that the POC cannot be approved for the requested access and notifies the POC via the System's workflow capability.
- **Comments and Considerations:** In addition to the notification, the System Security Officer will identify the issues that have caused the request to be denied. The System Security Officer should also work with the requestor to resolve the issues and gain the needed access.

30. System Security Officer Updates Access Management System

- **Description:** The System Security Officer updates the Access Management System to reflect the designated administrator's access to the newly granted access status.
- **Comments and Considerations:** The Access Management System would have administrative interfaces for Systems Security Officers to provision users. The interface would allow the System Security Officer to make updates in an intuitive manner.

31. Systems Provisioned by Access Management System

- **Description:** The FSA Program Systems to which access has been granted are now provisioned to allow for access by the newly authorized POC.

- **Comments and Considerations:** By making the updates in the Access Management System, the System Security Officer has caused changes in the FSA systems to which the POC has been granted access. The types of provisioning functionality provided by an Access Management System are described in Section 2.3 - Description of Access Management Components of the Access Management High-Level Design (Deliverable 123.1.29)

32. Communicate Approval to POC

- **Description:** The POC, having been approved for access will have their System access information communicated to them via the Access Management System's workflow capability.
- **Comments and Considerations:** The communication of the access information to the State Agency could be accomplished via an email to the POC but could also be transmitted in other manners to conform with security policies and the State Agency's capabilities.

33. Complete Use & Log-off

- **Description:** The User has now completed all Identification, Title IV, Program System and Security Processing steps and logs-off from the enrollment system.
- **Comments and Considerations:** The POC logs-off, and, as with every action the POC has taken while working within the system is time-stamped and logged for future review as needed.

4.4.5 Conceptual Federal Agency Enrollment Diagram

The following diagram depicts the business activity steps that a Federal Agency could follow to enroll with FSA in the high-level conceptual design:

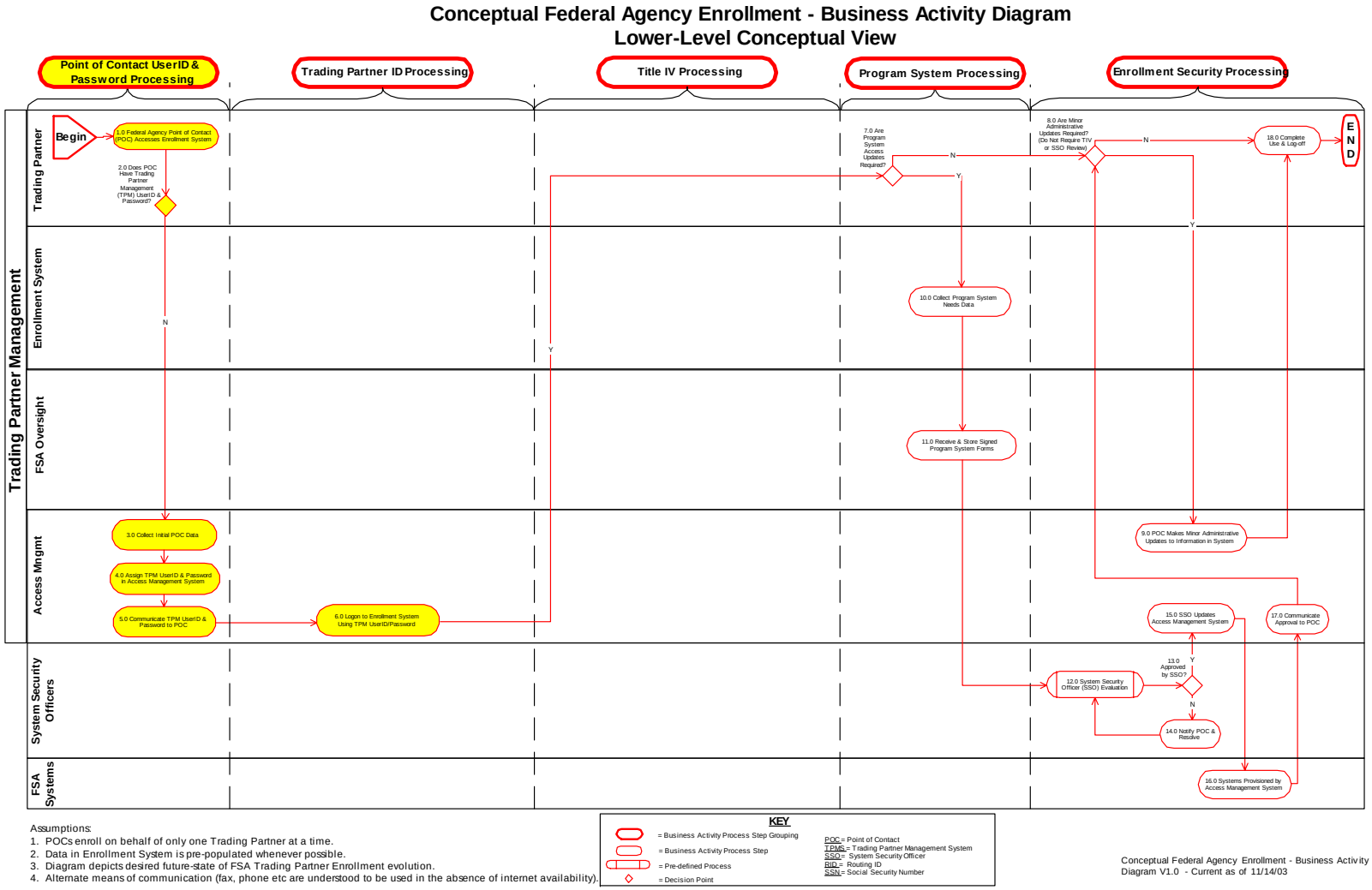


Figure 15 - Conceptual Federal Agency Enrollment – Business Activity Diagram

The Federal Agency Business Activity Diagram (Figure 15) involves the following Business Activity Process Steps. The Federal Agency POC's Conceptual Enrollment Diagram is similar to the Internal User's Conceptual Enrollment Diagram (Figure 16) because unlike the other Trading Partners, neither requires Title IV certification.

1. Federal Agency POC Accesses Enrollment System

    - **Description:** The Federal Agency POC is the individual that is seeking to complete the FSA enrollment process. The POC will initiate the enrollment process by logging onto the enrollment system. This URL will be the one point of entry for the POC to enroll for use of FSA systems. Appropriate education and training sessions will be created to inform the Trading Partner POCs of the URL. Detailed design will determine the exact URL and links associated with it (e.g. IFAP).
    - **Comments and Considerations:** Because each individual will have their own TPM UserID & password, the system tracks each transaction the POC performs.

2. Does POC have a TPM UserID and password?

    - **Description:** The first question that the enrollment website would ask the POC is whether or not that individual has a TPM UserID and password.
    - **Comments and Considerations:** While the TPM solution has not yet been defined, it is likely that there will be a single UserID and password (the TPM UserID and password) for each of individual.

3. Collect Initial POC Data

    - **Description:** If the POC indicates that they do not have a TPM UserID and password, they would be routed to the Access Management System. The Access Management System would collect initial demographic data about the POC. The demographic information collected during this step would be linked to the POC in the Access Management System from this point forward.
    - **Comments and Considerations:** Future consideration should be given to the possibility of incorporating an SSN screen at this step in the process. If this type of SSN screen were incorporated into the system, individuals who had been barred from accessing FSA systems would be immediately identified and disallowed to continue with the enrollment process.

4. Assign TPM UserID and password in Access Management System

    - **Description:** The assignment of a TPM UserID and password to the POC in the Access Management System is completed during this step. This is the same UserID and password that the POC will use to access the all parts of the TPM solution.

- **Comments and Considerations:** The initial UserID & password assigned to the Trading Partner POC will be updated by the POC upon initial logon to the system and again at regular intervals.

5. Communicate TPM UserID & password to POC

   - **Description:** Once the TPM UserID and password have been generated within the Access Management System, they will be communicated to the POC via email, phone or in another secure manner.
   - **Comments and Considerations:** FSA has guidelines in place governing the communication of UserID & password information. These guidelines should be taken into account when developing the UserID and password communication capability. The enrollment system would initially utilize the workflow capability contained within the Access Management System.

6. Logon to Enrollment System Using TPM UserID and password

   - **Description:** The POC now utilizes their TPM UserID and password to access the enrollment system.

7. Are Program System Access Updates Required?

   - **Description:** The is now asked the question of whether they have a need to gain new access for the POC to FSA Systems or need to modify POC access.

8. Collect Program System Needs Data

   - **Description:** The POC now must provide any additional information needed by the FSA system(s). The enrollment system asks the appropriate questions to obtain the information about the POC's possible system access needs.
   - **Comments and Considerations:** Federal Agency POCs will frequently require access to a specific FSA system. Traditionally, they only require access to three web-based systems. They can obtain access on a system-by-system basis, or like the other Trading Partners, could enroll in a group of systems that are related to the same FSA Program area.

9. Receive & Store Signed System Program Forms

   - **Description:** The FSA Oversight Representative/System Security Officer receives the signed forms and stores them.
   - **Comments and Considerations:** These forms may fall under the purview of the systems security officers' organization, depending on how FSA chooses to arrange for their review. Presently, System Security Officers review all system access requests on a system-by-system basis. The Access Management System would provide a centralized repository for information relating to Enterprise-wide

access management. Whatever policies are in place, however, the system's workflow capability will guide the forms through the process of sign-off requirements. The workflow capability would also identify and report instances where requests for access were not being handled in a timely manner.

10. System Security Officer Evaluation

- **Description:** This is a pre-defined process that exists outside of the enrollment initiative's scope. System Security Officers will utilize the system to track requests for system access and provide timely service to Trading Partner customers.
- **Comments and Considerations:** The enrollment system's workflow will track the amount of days that elapse and will allow System Security Officers to have a clear view of the items that require their review/attention. These evaluations may result in the need for the POC to provide additional security documentation/signatures but the System Security Officer would work with the POC to identify the need for any additional actions.

11. Approved by System Security Officer?

- **Description:** The System Security Officer must indicate whether or not they have approved the request(s) for access.
- **Comments and Considerations:** The System Security Officer process culminates when the System Security Officer signs-off on the request. By approving the request, the System Security Officer acknowledges that all other required signatures have been obtained. Frequently, one of the additional signatures that the System Security Officer must have before granting final approval is frequently that of the FSA Human Resources Representative. The inclusion of the Human Resources Representative indicates that the Federal Agency POC has received the required level of FSA Security clearance.

12. Notify POC & Resolve

- **Description:** The System Security Officer determines that the POC cannot be approved for the requested access and notifies the POC via the System's workflow capability.
- **Comments and Considerations:** In addition to the notification, the System Security Officer will identify the issues that have caused the request to be denied. The System Security Officer should also work with the requestor to resolve the issues and gain the needed access.

13. System Security Officer Updates Access Management System

- **Description:** The System Security Officer updates the Access Management System to reflect the POC's newly granted access status.

- **Comments and Considerations:** The Access Management System would have administrative interfaces for Systems Security Officers to provision users. The interface would allow the System Security Officer to make updates in an intuitive manner.

14. Systems Provisioned by Access Management System

- **Description:** The FSA Program Systems to which access was granted are now provisioned to allow for access by the newly authorized POC.
- **Comments and Considerations:** By making the updates in the Access Management System, the System Security Officer has caused changes in the FSA systems to which the POC has been granted access. The types of provisioning functionality provided by an Access Management System are described in Section 2.3 - Description of Access Management Components of the Access Management High-Level Design (Deliverable 123.1.29).

15. Communicate Approval to POC

- **Description:** The POC, after being approved for access will have their System access information communicated to them via the Access Management System's workflow capability.
- **Comments and Considerations:** The communication of the Access Information to the School could be accomplished via an email to the POC but could also be transmitted in other manners to conform to security policies and the Federal Agency's capabilities.

16. Complete Use & Log-off

- **Description:** The POC has now completed all Program System and Security processing steps and logs-off from the system.
- **Comments and Considerations:** The POC logs-off, and, as with every action the POC has taken while working within the system is time-stamped and logged for future review as needed.

4.4.6 Conceptual Internal User Enrollment Diagram

The following diagram depicts the business activity steps that an Individual User could follow to enroll with FSA in the high-level conceptual design:

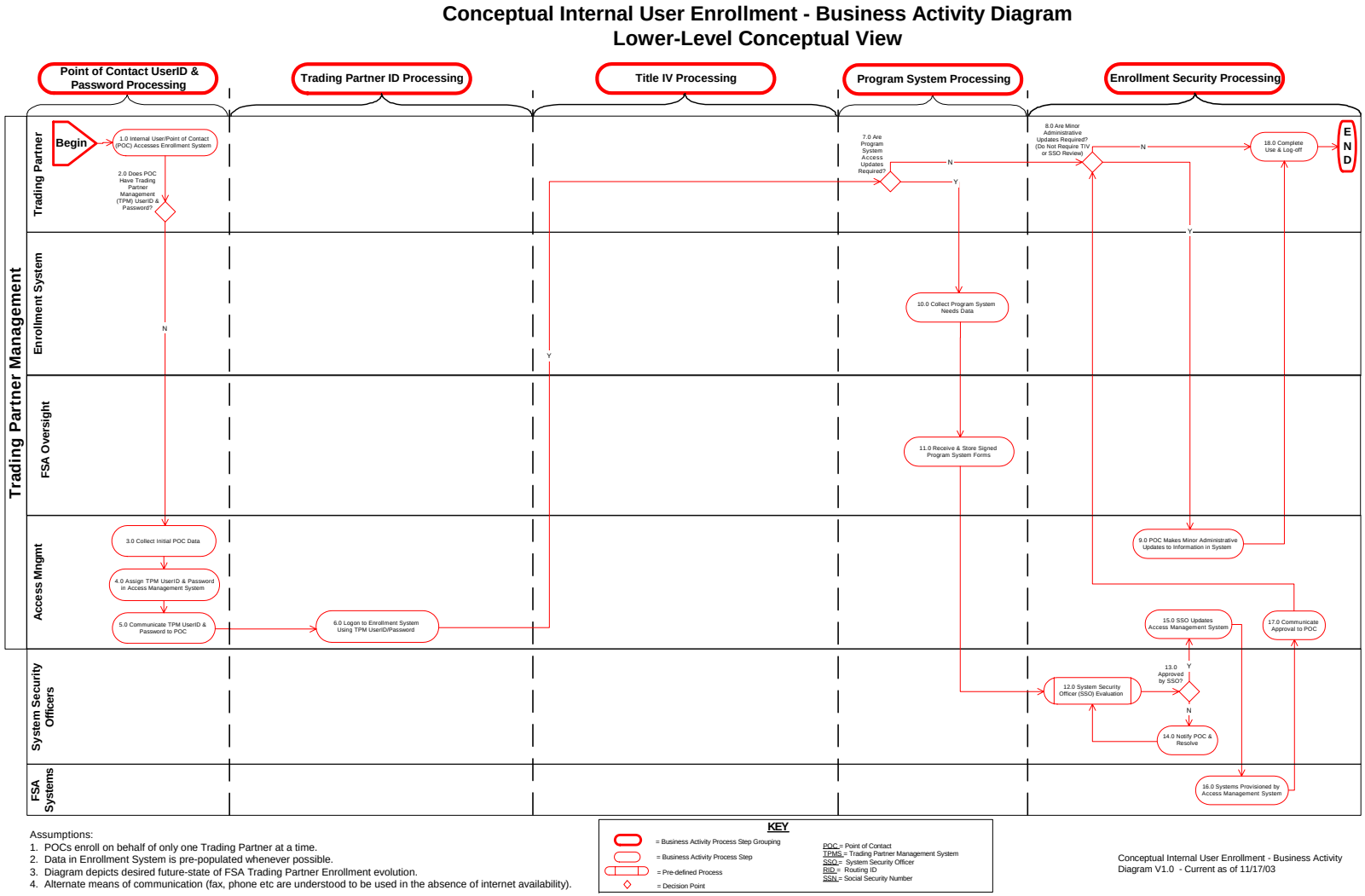


Figure 16 - Conceptual Internal User Enrollment – Business Activity Diagram

The Internal User Business Activity Diagram (Figure 16) involves the following Business Activity Process Steps.

1. Internal User/POC Accesses Enrollment System

    - **Description:** The POC is the individual that is seeking to complete the FSA enrollment process. The POC will initiate the enrollment process by logging onto the enrollment system. This URL will be the one point of entry for the POC to enroll for use of FSA systems. Appropriate education and training sessions will be created to inform the Trading Partner POCs of the URL. Detailed design will determine the exact URL and links associated with it (e.g. FP Portal/IFAP).
    - **Comments and Considerations:** Because each individual will have their own TPM UserID & password, the system tracks each transaction the POC performs.

2. Does POC have a TPM UserID and password?

    - **Description:** The first question that the enrollment website would ask the POC if they have a TPM UserID and password.
    - **Comments and Considerations:** While TPM solution has not yet been defined, it is likely that there will be a single UserID and password (the TPM UserID and password) for each of the individual that may need to interact with FSA's Title IV programs or their associated systems.

3. Collect Initial POC Data

    - **Description:** If the POC indicates that they do not have a TPM UserID and password, they would be routed to the Access Management System. The Access Management System would collect initial demographic data about the POC. The demographic information collected during this step would be linked to the POC in the Access Management System from this point forward.
    - **Comments and Considerations:** Future consideration should be given to the possibility of incorporating an SSN screen at this step in the process. If this type of SSN screen were incorporated into the system, individuals who had been barred from accessing FSA systems would be immediately identified and disallowed to continue with the enrollment process.

4. Assign TPM UserID and password in Access Management System

    - **Description:** The assignment of a TPM UserID and password to the POC in the Access Management System is completed during this step. This is the same UserID and password that the POC will use to access all parts of the TPM solution.
    - **Comments and Considerations:** The initial UserID & password assigned to the Trading Partner POC will be updated by the POC upon initial logon to the system and again at regular intervals.

5. Communicate TPM UserID & password to POC

    - **Description:** Once the TPM UserID and password have been generated within the Access Management System, they will be communicated to the POC via email, phone or in another secure manner.
    - **Comments and Considerations:** FSA has guidelines in place governing the communication of UserID & password information. These guidelines should be taken into account when developing the UserID and password communication capability. The enrollment system would initially utilize the workflow capability.

6. Logon to Enrollment System Using TPM UserID and password

    - **Description:** The POC now utilizes their TPM UserID and password to access the enrollment system.

7. Are Program System Access Updates Required?

    - **Description:** The is now asked the question of whether they have a need to gain new access for the POC to FSA Systems or need to modify POC access.

8. Collect Program System Needs Data

    - **Description:** The POC now must provide any additional information needed by the FSA system(s). The enrollment system asks the appropriate questions to obtain the information about the POC's possible system access needs.
    - **Comments and Considerations:** Internal Users will frequently require access to a specific FSA system. They can obtain access on a system-by-system basis, or like the other Trading Partners, can enroll in a group of systems that are related to the same FSA program area.

9. Receive & Store Signed System Program Forms

    - **Description:** The FSA Oversight Representative/System Security Officer receives the signed forms and stores them.
    - **Comments and Considerations:** These forms may fall under the purview of the systems security officers' organization, depending on how FSA chooses to arrange for their review. Presently, System Security Officers review all system access requests on a system-by-system basis. The Access Management System would provide a centralized repository for information relating to Enterprise-wide access management. Whatever policies are in place, however, the system's workflow capability will guide the forms through the process of sign-off requirements. The workflow capability would also identify and report instances where requests for access were not being handled in a timely manner.

10. System Security Officer Evaluation

- **Description:** This is a pre-defined process that exists outside of the enrollment initiative's scope. System Security Officers will utilize the system to track requests for system access and provide timely service to Trading Partner customers.
- **Comments and Considerations:** The enrollment system's workflow will track the amount of days that elapse and will allow System Security Officers to have a clear view of the items that require their review/attention. These evaluations may result in the need for the POC to provide additional security documentation/signatures but the System Security Officer would work with the POC to identify the need for any additional actions.

11. Approved by System Security Officer?

- **Description:** The System Security Officer must indicate whether or not they have approved the request(s) for access.
- **Comments and Considerations:** The System Security Officer process culminates when the System Security Officer signs-off on the request. By approving the request, the System Security Officer acknowledges that all other required signatures have been obtained. Frequently, one of the additional signatures that the System Security Officer must have before granting final approval is frequently that of the FSA Human Resources Representative. The inclusion of the Human Resources Representative indicates that FSA personnel and contractors, or other prospective System Users have been received the required level of Security clearance.

12. Notify POC & Resolve

- **Description:** The System Security Officer determines that the POC cannot be approved for the requested access and notifies the POC via the System's workflow capability.
- **Comments and Considerations:** In addition to the notification, the System Security Officer will identify the issues that have caused the request to be denied. The System Security Officer should also work with the requestor to resolve the issues and gain the needed access.

13. System Security Officer Updates Access Management System

- **Description:** The System Security Officer updates the Access Management System to reflect the POC's newly granted access status.
- **Comments and Considerations:** The Access Management System would have administrative interfaces for Systems Security Officers to provision users. The interface would allow the System Security Officer to make updates in an intuitive manner.

14. Systems Provisioned by Access Management System

- **Description:** The FSA Program Systems to which access was granted are now provisioned to allow for access by the newly authorized POC.
- **Comments and Considerations:** By making the updates in the Access Management System, the System Security Officer has caused changes in the FSA systems to which the POC has been granted access. The types of provisioning functionality provided by an Access Management System are described in Section 2.3 - Description of Access Management Components of the Access Management High-Level Design (Deliverable 123.1.29).

15. Communicate Approval to POC

- **Description:** The POC, after being approved for access will have their System access information communicated to them via the Access Management System's workflow capability.
- **Comments and Considerations:** The communication of the Access Information to the School could be accomplished via an email to the POC but could also be transmitted in other manners to conform to security policies and the Internal Users' capabilities.

16. Complete Use & Log-off

- **Description:** The POC has now completed all Program System and Security processing steps and logs-off from the system.
- **Comments and Considerations:** The POC logs-off, and, as with every action the POC has taken while working within the system is time-stamped and logged for future review as needed.

5 Enrollment Business Integration

5.1 Integration with TPM

The following six areas are key integration points for FSA enrollment.

- Initial Enrollment Login
- Assignment of TPM User Name and PW
- Initial Validation of TP
- Assignment of a RID/OPEID/LID
- Determining Title IV Eligibility
- System Security Evaluation

5.1.1 Initial Enrollment Login

The future Trading Partner enrollment process will need to be integrated with TPM to provide one point of entry for Trading Partner enrollment. This integration supports business objective A3.1 – "Streamlining enrollment and registration". The eventual Trading Partner Solution will provide a single starting point to allow Trading Partner Points of Contacts to Enroll in all needed FSA systems. TPM will also account for all the education and training requirements needed to teach the FSA community in how to use this new enrollment process. This is necessitated by business objective C3.1 – "Effective training and customer support."

5.1.2 Assignment of TPM UserID and Password

The future Trading Partner enrollment process will have to integrate with the final design of the Access Management System to assign and manage Trading Partner UserIDs and Passwords. This integration is necessary to adhere to business objective A2.1 – "Manage across systems". This integration would allow for a common UserID and Password to be initially used to complete the enrollment process and later to access FSA systems.

5.1.3 Initial Validation of Trading Partner

The steps that make up the initial validation of a Trading Partner are dictated by the type of Trading Partner that is enrolling for access to FSA systems. The key point of this integration step is to ensure that the Trading Partner enrollment system is able to collect and provide all the information needed by the decision making body to be able to make this initial validation. Furthermore, the Trading Partner enrollment system must contain the workflow capabilities necessary to move the data to the appropriate individuals for approval and have a mechanism to capture the validation decision.

5.1.4 Assignment of a RID/OPEID/LID

The implementation schedules of the RID project TPM efforts will need to be considered along with the enrollment initiative. The actual assignment of the IDs is a sub-process that takes place outside of the enrollment process. The enrollment system, however, will provide the information needed by the party assigning the ID. In addition, the enrollment system will have the ability to utilize the ID to associate the individual with the Trading Partner Entity. Furthermore, where possible, the workflow capability will be used to streamline or simplify the ID assignment process.

5.1.5 Determining Title IV Eligibility

The steps that make up the Title IV eligibility of a Trading Partner are dictated by the type of Trading Partner that is enrolling for access to FSA systems. The key point of this integration step is to ensure that the Trading Partner enrollment system is able to collect and provide all the information needed by the decision making body to be able to make this Title IV eligibility decision. Furthermore, the Trading Partner enrollment system must contain the workflow capabilities necessary to move the data to the appropriate individuals for approval and have a mechanism to capture the eligibility decision.

5.1.6 System Security Evaluation

The future Trading Partner enrollment process will have to integrate with the System Security Officer evaluation process that exists today. The current System Security Officer validation process is the last step prior to provisioning a user on an FSA System. It involves a System Security Officer evaluating an application and determining if that individual is eligible to have access to a particular system. The System Security Officer also determines if the appropriate signatures are collected on the enrollment forms. The enrollment system will need to be able to collect the appropriate data needed for each system and route that information to the appropriate System Security Officer for approval. The enrollment system would then need to track all the approvals and communicate the eligibility decision back to the user in order for that user to access the system with their previously assigned UserID and Password.

5.2 Other Enrollment Integration Considerations

This section contains some enrollment integration considerations that should be evaluated during the subsequent phases of FSA's enrollment effort. These considerations represent key findings or observation that will need to be considered or discussed by FSA management.

5.2.1 FSA Organization

In future phases of enrollment, FSA will need to carefully evaluate the FSA organizational structure needed to oversee and manage a new centralized process for enrollment. FSA will need to determine which FSA organization, group or person will make the ultimate decisions around Trading Partner enrollment. Today, individual system owners make this decision. In the future state where there is a single enrollment process, one FSA organization or group will need to make the decision on behalf of the Enterprise.

5.2.2 System Security Officer Organization Structure

One area of specific consideration within FSA should be the reporting structure of the System Security Officers and its effects on streamlining the enrollment process. Today, each System Security Officer reports to the business owner of the FSA system and is responsible for granting access to individual users. This method of approval creates a bottleneck for approving Trading Partner access by relying on a separate individual for each system. In addition, the current structure makes it very difficult to deploy a consistent FSA security policy or procedures. The System Security Officer reporting structure needs to be evaluated to determine whether it would be beneficial to have System Security Officers report to a centralized security office. This would allow a single System Security Officer to grant access to multiple FSA systems, thus removing delays in the enrollment process and allowing for easier dissemination of FSA security policies.

5.2.3 SAIG Mail Boxing

Integration with the SAIG mail boxing system will need to be considered very closely during the detailed requirement phase of enrollment. Currently SAIG allows mailboxes to be set up by a school or a user without necessarily tracing that mailbox back to an individual user. In addition, there is no current method of associating individual to the Trading Partner for which they work. Both of these points may become issues as the future FSA security requirements attempt to gain better control over who has access to what data. Similar issues may exist with other systems and should be considered in future efforts.

Furthermore, any possible enrollment solution that alters the current SAIG mailboxing processes should work closely with COD management to ensure all COD business processes are considered and impact to COD is minimal.

5.2.4 E-App

Future enrollment efforts will need to consider that the office of OMB approves the E-App every three years and any modifications to this form (and presumably consolidations of this form) will have to be approved by the office of OMB. The current E-App is approved through the year 2005.

5.2.5 Third Party Servicers

Third Party Servicers are entities that act on behalf of a Trading Partner to perform a sub set of the Trading Partner functions. Third Party servicers can act on behalf of a School, Lender or Guaranty Agency (GA). In discussions during the RID Core Team meeting it was revealed that while the Financial Partners track and approve Lender and GA services very closely, the school third party servicers are not centrally managed or tracked. The enrollment system will need to

work closely with FSA and the RID team to determine the best way to track and manager school third party servicers in the future.

Additional discussions in that RID Core Team meeting discussed a desire to track the functions that a third party servicer would provide on behalf of a Trading Partner to determine if the combination of the Trading Partner and their third party servicer were providing all functions needed to manage programs associated with the Trading Partner entity. This check is currently not a requirement for RID effort or enrollment, but may require further consideration in later phases of the project.

6 Next Steps

FSA's diverse user population and varying platforms and security structures create challenges for Trading Partners and FSA. The absence of an Enterprise view of enrollment and access management makes it difficult for FSA to properly monitor and review access to its systems while frustrating end users with multiple user IDs and passwords. The enrollment and access management vision is one of a consolidated view of enrollment and Trading Partner access management being managed at the Enterprise level and with Trading Partners insulated from the underlying complexity of FSA's systems. This consistent user identity and privilege information will improve security effectiveness and increase administrative efficiency. Enterprise access management makes it easier to perform common business processes such as creating a new institution or changing a user's status.

The enrollment and access management initiatives are an integral part of the overall TPM effort to simplify Trading Partner interaction with FSA. Including enrollment as a part of TPM would simplify and consolidate the data collection process and approval process in order to streamline the entire Trading Partner enrollment process. After a Trading Partner is successfully enrolled in FSA Systems, the Access Management portion of TPM will provision and manage authentication, authorization, and audit functions for subsequent Trading Partner participants. The combination of this simplified enrollment process coupled with an Enterprise access management system will greatly improve the Trading Partner's experience with FSA and provide additional security for FSA systems.

The completion of the high-level design marks a significant achievement on the road to completing a simplified enrollment process for Trading Partners. Further development of the enrollment system will now be incorporated into the Trading Partner Management effort to ensure proper integration with not only Access management, but also all other Data Strategy initiatives.

In a parallel with the TO 147 TPM Gap Analysis effort, the Access Management effort will progress with TO 143 Access and Identity Management Tools Analysis. The goal of this is to evaluate commercial products to demonstrate how they can be used to meet many of the FSA business objectives defined during the earlier phases of this project. This effort will provide recommendation for implementation of an Identity and Access Management technologies to satisfy FSA needs for security services across FSA user groups and environments. This effort will also include the development of a prototype of the selected Identity and Access Management solution integrated with a role-based FSA System in a development environment.

Appendix A: Current-State Enrollment Diagrams

Refer to the Appendix_A_Current-State Enrollment Diagrams v1.0.vsd file.

Appendix B: Current-State Enrollment Form Duplicate Data Analysis Spreadsheet

Refer to the Appendix_B_Current-State Enrollment Form Duplicate Data Analysis Spreadsheet v1.0.xls file.

Appendix C: Conceptual Enrollment Diagrams

Refer to the Appendix_C_Conceptual Enrollment Diagrams v1.0.vsd file.

Appendix D: Business Integration Group Vision Framework

Refer to the Appendix_D_Business Integration Group Vision Framework v5.xls file.

Appendix E: Enrollment & Access Management Vision Framework

Refer to the Appendix_E_Enrollment & Access Management Vision Framework v22.xls file.